

**PART 70 OPERATING PERMIT
and
ENHANCED NEW SOURCE REVIEW
OFFICE OF AIR MANAGEMENT
and
VIGO COUNTY AIR POLLUTION CONTROL**

**Schering-Plough Animal Health Corporation
1331 South First Street
Terre Haute, Indiana 47802**

Schering-Plough Animal Health Corporation is hereby authorized to operate subject to the conditions contained herein, the source described in Section A (Source Summary) of this permit.

This permit is issued in accordance with 326 IAC 2 and 40 CFR Part 70 Appendix A and contains the conditions and provisions specified in 326 IAC 2-7 and 326 IAC 2-1-3.2 as required by 42 U.S.C. 7401, et. seq. (Clean Air Act as amended by the 1990 Clean Air Act Amendments), 40 CFR Part 70.6, IC 13-15 and IC 13-17.

Operation Permit No.: T167-7544-00004	
Issued by: Janet G. McCabe, Assistant Commissioner Office of Air Management	Issuance Date:

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SECTION A

SOURCE SUMMARY

This permit is based on information requested by the Indiana Department of Environmental Management (IDEM), Office of Air Management (OAM), and Vigo County Air Pollution Control (VCAPC). The information describing the source contained in conditions A.1 through A.3 is descriptive information and does not constitute enforceable conditions. However, the Permittee should be aware that a physical change or a change in the method of operation that may render this descriptive information obsolete or inaccurate may trigger requirements for the Permittee to obtain additional permits or seek modification of this permit pursuant to 326 IAC 2, or change other applicable requirements presented in the permit application.

A.1 General Information [326 IAC 2-7-4(c)] [326 IAC 2-7-5(15)]

The Permittee owns and operates a stationary animal pharmaceutical production facility.

Responsible Official:	J. Richard Chiesa
Source Address:	1331 South First Street, Terre Haute, Indiana, 47802
Mailing Address:	Same as Source Address
SIC Code:	2834 and 2048
County Location:	Vigo County
County Status:	Attainment for all criteria pollutants
Source Status:	Part 70 Permit Program
	Minor Source under PSD and Emission Offset
	Major Source under Section 112

A.2 Emission Units and Pollution Control Equipment Summary [326 IAC 2-7-4(c)(3)] [326 IAC 2-7-5(15)]

This stationary source consists of the following emission units and pollution control devices:

- (1) Two (2) natural gas fired boilers with #2 fuel oil as backup fuel, identified as, B-101 and B-102, respectively, with a maximum capacity of 16.6 million (MM) British thermal unit (Btu) per hour heat input each, and exhausting at two (2) stacks (STK-B1 and STK-B2).
- (2) A Clinacox pharmaceutical premix feed blending/bagging facility capable of producing six (6) 5,000 pound batches per day, exhausting at three (3) stacks (STK-C1, STK-C2, and STK-C3). The facility will include the following dust collectors:
 - a) Receiving Silo Dust Collector, DC-101 (also referred to as BH-10)
 - b) Process Silo Dust Collector, DC-102 (also referred to as BH-11)
 - c) Ribbon Blender Dust Collector, DC-201 (also referred to as BH-12)
 - d) Product Bagging Dust Collector, DC-301 (also referred to as BH-13)
 - e) Weighing & Mixing Dust Collector, DC-401 (also referred to as BH-14)
- (3) One (1) salt solution storage tank with a 1,000 cubic foot capacity and a wet scrubber for dust control, exhausting at one (1) stack (STK-S1).
- (4) A Zeranol pharmaceutical producing operation used for the production of Ralgro®, a cattle growth promotant. This facility has maximum potential capacity of 132 batches per year. The process contains two (2) dust collectors (DC-202, and DC-203) with the emissions exhausting at stack STK-202 and stack STK-203, respectively.

A.3 Specifically Regulated Insignificant Activities [326 IAC 2-7-1(21)] [326 IAC 2-7-4(c)] [326 IAC 2-7-5(15)]

This stationary source also includes the following insignificant activities which are specifically regulated, as defined in 326 IAC 2-7-1(21):

- (1) Storage tanks with capacity less than or equal to 1,000 gallons and annual throughputs less than 12,000 gallons.
- (2) Vessels storing lubricating oils, hydraulic oils, machining oils, and machining fluids.

- (3) Degreasing operations that do not exceed 145 gallons per 12 months, except if subject to 326 IAC 20-6.
- (4) Cleaners and solvents characterized as follows:
 - A) having a vapor pressure equal to or less than 2 kPa; 15mm Hg; or 0.3 psi measured at 38 degrees C (100EF) or;
 - B) having a vapor pressure equal to or less than 0.7 kPa; 5mm Hg; or 0.1 psi measured at 20EC (68EF); the use of which for all cleaners and solvents combined does not exceed 145 gallons per 12 months.
- (5) The following equipment related to manufacturing activities not resulting in the emission of HAPs: brazing equipment, cutting torches, soldering equipment, welding equipment.
- (6) Solvent recycling systems with batch capacity less than or equal to 100 gallons.
- (7) Activities associated with the treatment of wastewater streams with an oil and grease content less than or equal to 1% by volume.
- (8) Any operation using aqueous solutions containing less than 1% by weight of VOCs excluding HAPs.
- (9) Replacement or repair of electrostatic precipitators, bags in baghouses and filters in other air filtration equipment.
- (10) Process vessel degassing and cleaning to prepare for internal repairs.
- (11) Stockpiled soils from soil remediation activities that are covered and waiting transport for disposal.
- (12) Paved and unpaved roads and parking lots with public access.
- (13) Asbestos abatement projects regulated by 326 IAC 14-10.
- (14) Equipment used to collect any material that might be released during a malfunction, process upset, or spill cleanup, including catch tanks, temporary liquid separators, tanks, and fluid handling equipment.
- (15) Blowdown for any of the following: sight glass; boiler; compressors; pumps; and cooling tower.
- (16) On-site fire and emergency response training approved by the department.
- (17) Stationary fire pumps.
- (18) A laboratory as defined in 326 IAC 2-7-1(20)(c).
- (19) Other activities or categories not previously identified:
 - Current process wastewater pretreatment system
 - In-Construction process wastewater pretreatment system
 - Fuel oil storage tank (25,000-gallon AST)
 - Methanol storage tank V-201A (3,700-gallon AST)
 - Methanol storage tank V-201B (3,700-gallon AST)
 - Methanol storage tank V-201C (3,700-gallon AST)
 - Methanol storage tank V-201D (3,700-gallon AST)

Tertiary butyl alcohol storage tank V-202A (3,700-gallon AST)
Tertiary butyl alcohol storage tank V-202B (3,700-gallon AST)
Recovered methanol storage tank V-203A (3,700-gallon AST)
Recovered methanol storage tank V-203B (3,700-gallon AST)
Unpaved roads (not public access)
Portable water pump
5-gallon reactor for pilot scale R&D Zeranol studies
Ralgro Pelletizing
Ralgro Packaging
0.95 MM Btu/hr standby generator
Outfall Pond#1
P-1492 Production - Fermentation Area
P-1492 Production - Dryer Room

A.4 Part 70 Permit Applicability [326 IAC 2-7-2]

This stationary source is required to have a Part 70 permit by 326 IAC 2-7-2 (Applicability) because:

- (a) It is a major source, as defined in 326 IAC 2-7-1(22)
- (b) It is a source in a source category designated by the United States Environmental Protection Agency (U.S. EPA) under 40 CFR 70.3 (Part 70 - Applicability).

SECTION B

GENERAL CONDITIONS

B.1 Permit No Defense [326 IAC 2-1-10] [IC 13]

- (a) Indiana statutes from IC 13 and rules from 326 IAC, quoted in conditions in this permit, are those applicable at the time the permit was issued. The issuance or possession of this permit shall not alone constitute a defense against an alleged violation of any law, regulation or standard, except for the requirement to obtain a Part 70 permit under 326 IAC 2-7.
- (b) This prohibition shall not apply to alleged violations of applicable requirements for which the Commissioner has granted a permit shield in accordance with 326 IAC 2-1-3.2 or 326 IAC 2-7-15, as set out in this permit in the Section B condition entitled "Permit Shield."

B.2 Definitions [326 IAC 2-7-1]

Terms in this permit shall have the definition assigned to such terms in the referenced regulation. In the absence of definitions in the referenced regulation, any applicable definitions found in IC 13-11, 326 IAC 1-2 and 326 IAC 2-7 shall prevail.

B.3 Permit Term [326 IAC 2-7-5(2)]

This permit is issued for a fixed term of five (5) years from the effective date, as determined in accordance with IC 4-21.5-3-5(f) and IC 13-15-5-3.

B.4 Enforceability [326 IAC 2-7-7(a)]

- (a) All terms and conditions in this permit, including any provisions designed to limit the source's potential to emit, are enforceable by IDEM and VCAPC.
- (b) Unless otherwise stated, terms and conditions of this permit, including any provisions to limit the source's potential to emit, are enforceable by the United States Environmental Protection Agency (U.S. EPA) and citizens under the Clean Air Act.
- (c) All terms and conditions in this permit that are local requirements, including any provisions designed to limit the source's potential to emit, are enforceable by VCAPC.

B.5 Termination of Right to Operate [326 IAC 2-7-10] [326 IAC 2-7-4(a)]

The Permittee's right to operate this source terminates with the expiration of this permit unless a timely and complete renewal application is submitted at least nine (9) months prior to the date of expiration of the source's existing permit, consistent with 326 IAC 2-7-3 and 326 IAC 2-7-4(a).

B.6 Severability [326 IAC 2-7-5(5)]

- (a) The provisions of this permit are severable; a determination that any portion of this permit is invalid shall not affect the validity of the remainder of the permit.

B.7 Property Rights or Exclusive Privilege [326 IAC 2-7-5(6)(D)]

This permit does not convey any property rights of any sort, or any exclusive privilege.

B.8 Duty to Supplement and Provide Information [326 IAC 2-7-4(b)] [326 IAC 2-7-5(6)(E)]

- (a) The Permittee, upon becoming aware that any relevant facts were omitted or incorrect information was submitted in the permit application, shall promptly submit such supplementary facts or corrected information to:

Indiana Department of Environmental Management
Permits Branch, Office of Air Management
100 North Senate Avenue, P. O. Box 6015
Indianapolis, Indiana 46206-6015

and

Vigo County Air Pollution Control
201 Cherry Street
Terre Haute, Indiana 47807

- (b) The Permittee shall furnish to IDEM, OAM, and VCAPC within a reasonable time, any information that IDEM, OAM, and VCAPC may request in writing to determine whether cause exists for modifying, revoking and reissuing, or terminating this permit, or to determine compliance with this permit.
- (c) Upon request, the Permittee shall also furnish to IDEM, OAM, and VCAPC copies of records required to be kept by this permit. If the Permittee wishes to assert a claim of confidentiality over any of the furnished records, the Permittee must furnish such records to IDEM, OAM, and VCAPC along with a claim of confidentiality under 326 IAC 17. If requested by IDEM, OAM, or the U.S. EPA, to furnish copies of requested records directly to U.S. EPA, and if the Permittee is making a claim of confidentiality regarding the furnished records, then the Permittee must furnish such confidential records directly to the U.S. EPA along with a claim of confidentiality under 40 CFR 2, Subpart B.

B.9 Compliance with Permit Conditions [326 IAC 2-7-5(6)(A)] [326 IAC 2-7-5(6)(B)]

- (a) The Permittee must comply with all conditions of this permit. Noncompliance with any provisions of this permit constitutes a violation of the Clean Air Act and is grounds for:
- (1) Enforcement action;
 - (2) Permit termination, revocation and reissuance, or modification; or for
 - (3) Denial of a permit renewal application.
- (b) It shall not be a defense for the Permittee in an enforcement action that it would have been necessary to halt or reduce the permitted activity in order to maintain compliance with the conditions of this permit.

B.10 Certification [326 IAC 2-7-4(f)] [326 IAC 2-7-6(1)]

- (a) Any application form, report, or compliance certification submitted under this permit shall contain certification by a responsible official of truth, accuracy, and completeness. This certification, and any other certification required under this permit, shall state that, based on information and belief formed after reasonable inquiry, the statements and information in the document are true, accurate, and complete.
- (b) One (1) certification shall be included, on the attached Certification Form, with each submittal.
- (c) A responsible official is defined at 326 IAC 2-7-1(34).

B.11 Annual Compliance Certification [326 IAC 2-7-6(5)]

- (a) The Permittee shall annually submit a compliance certification report which addresses the status of the source's compliance with the terms and conditions contained in this permit, including emission limitations, standards, or work practices. The certification shall cover the time period from January 1 to December 31 of the previous year, and shall be submitted in letter form no later than July 1 of each year to:
Indiana Department of Environmental Management
Compliance Data Section, Office of Air Management
100 North Senate Avenue, P. O. Box 6015
Indianapolis, Indiana 46206-6015

and

Vigo County Air Pollution Control
201 Cherry Street
Terre Haute, Indiana 47807

and

United States Environmental Protection Agency, Region V
Air and Radiation Division, Air Enforcement Branch - Indiana (AE-17J)
77 West Jackson Boulevard
Chicago, Illinois 60604-3590
- (b) This annual compliance certification report required by this permit shall be considered timely if the date postmarked on the envelope or certified mail receipt, or affixed by the shipper on the private shipping receipt, is on or before the date it is due. If the document is submitted by any other means, it shall be considered timely if received by IDEM, OAM, and VCAPC on or before the date it is due.
- (c) The annual compliance certification report shall include the following:
 - (1) The identification of each term or condition of this permit that is the basis of the certification;
 - (2) The compliance status;
 - (3) Whether compliance was based on continuous or intermittent data;
 - (4) The methods used for determining compliance of the source, currently and over the reporting period consistent with 326 IAC 2-7-5(3);
 - (5) Any insignificant activity that has been added without a permit revision; and
 - (6) Such other facts, as specified in Sections D of this permit, as IDEM, OAM, and VCAPC, may require to determine the compliance status of the source.

The submittal by the Permittee does require the certification by the "responsible official" as defined by 326 IAC 2-7-1(34).

B.12 Preventive Maintenance Plan [326 IAC 2-7-5(1),(3) and (13)] [326 IAC 2-7-6(1) and (6)] [326 IAC 1-6-3]

(a) If required by specific condition(s) in Section D of this permit, the Permittee shall prepare and maintain Preventive Maintenance Plans (PMP) within ninety (90) days after issuance of this permit, including the following information on each facility:

- (1) Identification of the individual(s) responsible for inspecting, maintaining, and repairing emission control devices;
- (2) A description of the items or conditions that will be inspected and the inspection schedule for said items or conditions;
- (3) Identification and quantification of the replacement parts that will be maintained in inventory for quick replacement.

If due to circumstances beyond its control, the PMP cannot be prepared and maintained within the above time frame, the Permittee may extend the date an additional ninety (90) days provided the Permittee notifies:

Indiana Department of Environmental Management
Compliance Branch, Office of Air Management
100 North Senate Avenue, P. O. Box 6015
Indianapolis, Indiana 46206-6015

and

Vigo County Air Pollution Control
201 Cherry Street
Terre Haute, Indiana 47807

- (b) The Permittee shall implement the Preventive Maintenance Plans as necessary to ensure that lack of proper maintenance does not cause or contribute to a violation of any limitation on emissions or potential to emit.
- (c) PMP's shall be submitted to IDEM, OAM, and VCAPC upon request and shall be subject to review and approval by IDEM, OAM, and VCAPC.

B.13 Emergency Provisions [326 IAC 2-7-16]

(a) An emergency, as defined in 326 IAC 2-7-1(12), is not an affirmative defense for an action brought for noncompliance with a federal or state health-based emission limitation, except as provided in 326 IAC 2-7-16.

(b) An emergency, as defined in 326 IAC 2-7-1(12), constitutes an affirmative defense to an action brought for noncompliance with a health-based or technology-based emission limitation if the affirmative defense of an emergency is demonstrated through properly signed, contemporaneous operating logs or other relevant evidence that describe the following:

- (1) An emergency occurred and the Permittee can, to the extent possible, identify the causes of the emergency;
- (2) The permitted facility was at the time being properly operated;
- (3) During the period of an emergency, the Permittee took all reasonable steps to minimize levels of emissions that exceeded the emission standards or other requirements in this permit;

- (4) For each emergency lasting one (1) hour or more, the Permittee notified IDEM, OAM, and VCAPC within four (4) daytime business hours after the beginning of the emergency, or after the emergency was discovered or reasonably should have been discovered;

Telephone Number: 1-800-451-6027 (ask for Office of Air Management, Compliance Section), or

Telephone Number: 317-233-5674 (ask for Compliance Section)

Facsimile Number: 317-233-5967

VCAPC Telephone Number: 812-462-3433

VCAPC Facsimile Number: 812-462-3447

- (5) For each emergency lasting one (1) hour or more, the Permittee submitted notice, either in writing or facsimile, of the emergency to:

Indiana Department of Environmental Management
Compliance Branch, Office of Air Management
100 North Senate Avenue, P. O. Box 6015
Indianapolis, Indiana 46206-6015

and

Vigo County Air Pollution Control
201 Cherry Street
Terre Haute, Indiana 47807

within two (2) working days of the time when emission limitations were exceeded due to the emergency.

The notice fulfills the requirement of 326 IAC 2-7-5(3)(C)(ii) and must contain the following:

- (A) A description of the emergency;
- (B) Any steps taken to mitigate the emissions; and
- (C) Corrective actions taken.

The notification which shall be submitted by the Permittee does not require the certification by the "responsible official" as defined by 326 IAC 2-7-1(33).

- (6) The Permittee immediately took all reasonable steps to correct the emergency.
- (c) In any enforcement proceeding, the Permittee seeking to establish the occurrence of an emergency has the burden of proof.
 - (d) This emergency provision supersedes 326 IAC 1-6 (Malfunctions) for sources subject to this rule after the effective date of this rule. This permit condition is in addition to any emergency or upset provision contained in any applicable requirement.
 - (e) IDEM, OAM and VCAPC may require that the Preventive Maintenance Plans required under 326 IAC 2-7-4-(c)(9) be revised in response to an emergency.
 - (f) Failure to notify IDEM, OAM, and VCAPC by telephone or facsimile of an emergency lasting more than one (1) hour in compliance with (b)(4) and (5) of this condition shall constitute a violation of 326 IAC 2-7 and any other applicable rules.

- (g) Operations may continue during an emergency only if the following conditions are met:
 - (1) If the emergency situation causes a deviation from a technology-based limit, the Permittee may continue to operate the affected emitting facilities during the emergency provided the Permittee immediately takes all reasonable steps to correct the emergency and minimize emissions.
 - (2) If an emergency situation causes a deviation from a health-based limit, the Permittee may not continue to operate the affected emissions facilities unless:
 - (A) The Permittee immediately takes all reasonable steps to correct the emergency situation and to minimize emissions; and
 - (B) Continued operation of the facilities is necessary to prevent imminent injury to persons, severe damage to equipment, substantial loss of capital investment, or loss of product or raw materials of substantial economic value.Any operation shall continue no longer than the minimum time required to prevent the situations identified in (g)(2)(B) of this condition.

B.14 Permit Shield [326 IAC 2-7-15]

- (a) This condition provides a permit shield as addressed in 326 IAC 2-7-15.
- (b) This permit shall be used as the primary document for determining compliance with applicable requirements established by previously issued permits. Compliance with the conditions of this permit shall be deemed in compliance with any applicable requirements as of the date of permit issuance, provided that:
 - (1) The applicable requirements are included and specifically identified in this permit; or
 - (2) The permit contains an explicit determination or concise summary of a determination that other specifically identified requirements are not applicable.
- (c) If, after issuance of this permit, it is determined that the permit is in nonconformance with an applicable requirement that applied to the source on the date of permit issuance, including any term or condition from a previously issued construction or operation permit, IDEM, OAM shall immediately take steps to reopen and revise this permit and issue a compliance order to the Permittee to ensure expeditious compliance with the applicable requirement until the permit is reissued. The permit shield shall continue in effect so long as the Permittee is in compliance with the compliance order.
- (d) No permit shield shall apply to any permit term or condition that is determined after issuance of this permit to have been based on erroneous information supplied in the permit application.
- (e) Nothing in 326 IAC 2-7-15 or in this permit shall alter or affect the following:
 - (1) The provisions of Section 303 of the Clean Air Act (emergency orders), including the authority of the U.S. EPA under Section 303 of the Clean Air Act;
 - (2) The liability of the Permittee for any violation of applicable requirements prior to or at the time of this permit's issuance;
 - (3) The applicable requirements of the acid rain program, consistent with Section 408(a) of the Clean Air Act; and
 - (4) The ability of U.S. EPA to obtain information from the Permittee under Section 114 of the Clean Air Act.

- (f) This permit shield is not applicable to any change made under 326 IAC 2-7-20(b)(2) (Sections 502(b)(10) of the Clean Air Act changes) and 326 IAC 2-7-20(c)(2) (trading based on State Implementation Plan (SIP) provisions).
- (g) This permit shield is not applicable to modifications eligible for group processing until after IDEM, OAM, and VCAPC has issued the modifications. [326 IAC 2-7-12(c)(7)]
- (h) This permit shield is not applicable to minor Part 70 permit modifications until after IDEM, OAM, and VCAPC has issued the modification. [326 IAC 2-7-12(b)(8)]

B.15 Multiple Exceedances [326 IAC 2-7-5(1)(E)]

Any exceedance of a permit limitation or condition contained in this permit, which occurs contemporaneously with an exceedance of an associated surrogate or operating parameter established to detect or assure compliance with that limit or condition, both arising out of the same act or occurrence, shall constitute a single potential violation of this permit.

B.16 Deviations from Permit Requirements and Conditions [326 IAC 2-7-5(3)(C)(ii)]

- (a) Deviations from any permit requirements (for emergencies see Section B - Emergency Provisions), the probable cause of such deviations, and any response steps or preventive measures taken shall be reported to:

Indiana Department of Environmental Management
Compliance Branch, Office of Air Management
100 North Senate Avenue, P.O. Box 6015
Indianapolis, Indiana 46206-6015

and
Vigo County Air Pollution Control
201 Cherry Street
Terre Haute, Indiana 47807

within ten (10) calendar days from the date of the discovery of the deviation.

- (b) A deviation is an exceedance of a permit limitation or a failure to comply with a requirement of the permit or a rule. It does not include:
 - (1) An excursion from compliance monitoring parameters as identified in Section D of this permit unless tied to an applicable rule or limit; or
 - (2) An emergency as defined in 326 IAC 2-7-1(12); or
 - (3) Failure to implement elements of the Preventive Maintenance Plan unless lack of maintenance has caused or contributed to a deviation.
 - (4) Failure to make or record information required by the compliance monitoring provisions of Section D unless such failure exceeds 5% of the required data in any calendar quarter.

A Permittee's failure to take the appropriate response step when an excursion of a compliance monitoring parameter has occurred is a deviation.

- (c) Written notification shall be submitted on the attached Emergency/Deviation Occurrence Reporting Form or its substantial equivalent. The notification does not need to be certified by the "responsible official" as defined by 326 IAC 2-7-1(34).
- (d) Proper notice submittal under 326 IAC 2-7-16 satisfies the requirement of this subsection.

B.17 Permit Modification, Reopening, Revocation and Reissuance, or Termination

[326 IAC 2-7-5(6)(C)] [326 IAC 2-7-8(a)] [326 IAC 2-7-9]

- (a) This permit may be modified, reopened, revoked and reissued, or terminated for cause. The filing of a request by the Permittee for a Part 70 permit modification, revocation and reissuance, or termination, or of a notification of planned changes or anticipated noncompliance does not stay any condition of this permit. [326 IAC 2-7-5(6)(C)]
- (b) This permit shall be reopened and revised under any of the circumstances listed in IC 13-15-7-2 or if IDEM, OAM and VCAPC determines any of the following:
 - (1) That this permit contains a material mistake.
 - (2) That inaccurate statements were made in establishing the emissions standards or other terms or conditions.
 - (3) That this permit must be revised or revoked to assure compliance with an applicable requirement. [326 IAC 2-7-9(a)(3)]
- (c) Proceedings by IDEM, OAM, and VCAPC to reopen and revise this permit shall follow the same procedures as apply to initial permit issuance and shall affect only those parts of this permit for which cause to reopen exists. Such reopening and revision shall be made as expeditiously as practicable. [326 IAC 2-7-9(b)]
- (d) The reopening and revision of this permit, under 326 IAC 2-7-9(a), shall not be initiated before notice of such intent is provided to the Permittee by IDEM, OAM, and VCAPC at least thirty (30) days in advance of the date this permit is to be reopened, except that IDEM, OAM, and VCAPC may provide a shorter time period in the case of an emergency. [326 IAC 2-7-9(c)]

B.18 Permit Renewal [326 IAC 2-7-4]

- (a) The application for renewal shall be submitted using the application form or forms prescribed by IDEM, OAM, and VCAPC and shall include, the information specified in 326 IAC 2-7-4. Such information shall be included in the application for each emission unit at this source, except those emission units included on the trivial or insignificant activities list contained in 326 IAC 2-7-1(21) and 326 IAC 2-7-1(40).

Request for renewal shall be submitted to:

Indiana Department of Environmental Management
Permits Branch, Office of Air Management
100 North Senate Avenue, P.O. Box 6015
Indianapolis, Indiana 46206-6015

and

Vigo County Air Pollution Control
201 Cherry Street
Terre Haute, Indiana 47807

- (b) Timely Submittal of Permit Renewal [326 IAC 2-7-4(a)(1)(D)]
 - (1) A timely renewal application is one that is:
 - (A) Submitted at least nine (9) months prior to the date of the expiration of this permit; and

- (B) If the date postmarked on the envelope or certified mail receipt, or affixed by the shipper on the private shipping receipt, is on or before the date it is due. If the document is submitted by any other means, it shall be considered timely if received by IDEM, OAM, and VCAPC on or before the date it is due. [326 IAC 2-5-3]
- (2) If IDEM, OAM and VCAPC, upon receiving a timely and complete permit application, fails to issue or deny the permit renewal prior to the expiration date of this permit, this existing permit shall not expire and all terms and conditions shall continue in effect, including any permit shield provided in 326 IAC 2-7-15, until the renewal permit has been issued or denied.
- (c) Right to Operate After Application for Renewal [326 IAC 2-7-3]
If the Permittee submits a timely and complete application for renewal of this permit, the source's failure to have a permit is not a violation of 326 IAC 2-7 until IDEM, OAM and VCAPC, takes final action on the renewal application, except that this protection shall cease to apply if, subsequent to the completeness determination, the Permittee fails to submit by the deadline specified in writing by IDEM, OAM, and VCAPC, any additional information identified as being needed to process the application.
- (d) United States Environmental Protection Agency Authority [326 IAC 2-7-8(e)]
If IDEM, OAM and VCAPC fails to act in a timely way on a Part 70 permit renewal, the U.S. EPA may invoke its authority under Section 505(e) of the Clean Air Act to terminate or revoke and reissue a Part 70 permit.

B.19 Permit Amendment or Modification [326 IAC 2-7-11][326 IAC 2-7-12]

- (a) The Permittee must comply with the requirements of 326 IAC 2-7-11 or 326 IAC 2-7-12 whenever the Permittee seeks to amend or modify this permit.
- (b) Any application requesting an amendment or modification of this permit shall be submitted to:

Indiana Department of Environmental Management
Permits Branch, Office of Air Management
100 North Senate Avenue, P.O. Box 6015
Indianapolis, Indiana 46206-6015

and

Vigo County Air Pollution Control
201 Cherry Street
Terre Haute, Indiana 47807

Any such application should be certified by the "responsible official" as defined by 326 IAC 2-7-1(34) only if a certification is required by the terms of the applicable rule.
- (c) The Permittee may implement the administrative amendment changes addressed in the request for an administrative amendment immediately upon submittal of the request. [326 IAC 2-7-11(c)(3)]

**B.20 Permit Revision Under Economic Incentives and Other Programs [326 IAC 2-7-5(8)]
[326 IAC 2-7-12 (b)(2)]**

- (a) No Part 70 permit revision shall be required under any approved economic incentives, marketable Part 70 permits, emissions trading, and other similar programs or processes for changes that are provided for in a Part 70 permit.

- (b) Notwithstanding 326 IAC 2-7-12(b)(1)(D)(I) and 326 IAC 2-7-12(c)(1), minor Part 70 permit modification procedures may be used for Part 70 modifications involving the use of economic incentives, marketable Part 70 permits, emissions trading, and other similar approaches to the extent that such minor Part 70 permit modification procedures are explicitly provided for in the applicable State Implementation Plan (SIP) or in applicable requirements promulgated or approved by the U.S. EPA.

B.21 Changes Under Section 502(b)(10) of the Clean Air Act [326 IAC 2-7-20(b)]

The Permittee may make Section 502(b)(10) of the Clean Air Act changes (this term is defined at 326 IAC 2-7-1(36)) without a permit revision, subject to the constraint of 326 IAC 2-7-20(a) and the following additional conditions:

- (a) For each such change, the required written notification shall include a brief description of the change within the source, the date on which the change will occur, any change in emissions, and any permit term or condition that is no longer applicable as a result of the change.
- (b) The permit shield, described in 326 IAC 2-7-15, shall not apply to any change made under 326 IAC 2-7-20(b).

B.22 Operational Flexibility [326 IAC 2-7-20]

- (a) The Permittee may make any change or changes at the source that are described in 326 IAC 2-7-20(b), (c), or (e), without a prior permit revision, if each of the following conditions is met:

- (1) The changes are not modifications under any provision of Title I of the Clean Air Act;
- (2) Any approval required by 326 IAC 2-1 has been obtained;
- (3) The changes do not result in emissions which exceed the emissions allowable under this permit (whether expressed herein as a rate of emissions or in terms of total emissions);
- (4) The Permittee notifies the:

Indiana Department of Environmental Management
Permits Branch, Office of Air Management
100 North Senate Avenue, P. O. Box 6015
Indianapolis, Indiana 46206-6015

and

Vigo County Air Pollution Control
201 Cherry Street
Terre Haute, Indiana 47807

and

United States Environmental Protection Agency, Region V
Air and Radiation Division, Regulation Development Branch - Indiana (AR-18J)
77 West Jackson Boulevard
Chicago, Illinois 60604-3590

in advance of the change by written notification at least ten (10) days in advance of the proposed change. The Permittee shall attach every such notice to the Permittee's copy of this permit; and

- (5) The Permittee maintains records on-site which document, on a rolling five (5) year basis, all such changes and emissions trading that are subject to 326 IAC 2-7-20(b), (c), or (e) and makes such records available, upon reasonable request, to public review.

Such records shall consist of all information required to be submitted to IDEM, OAM, and VCAPC in the notices specified in 326 IAC 2-7-20(b), (c)(1), and (e)(2).

- (b) For each such Section 502(b)(10) of the Clean Air Act change, the required written notification shall include the following:
- (1) A brief description of the change within the source;
 - (2) The date on which the change will occur;
 - (3) Any change in emissions; and
 - (4) Any permit term or condition that is no longer applicable as a result of the change.

The notification which shall be submitted by the Permittee does not require the certification by the "responsible official" as defined by 326 IAC 2-7-1(33).

- (c) Emission Trades [326 IAC 2-7-20(c)]
The Permittee may trade increases and decreases in emissions in the source, where the applicable SIP provides for such emission trades without requiring a permit revision, subject to the constraints of Section (a) of this condition and those in 326 IAC 2-7-20(c).
- (d) Alternative Operating Scenarios [326 IAC 2-7-20(d)]
The Permittee may make changes at the source within the range of alternative operating scenarios that are described in the terms and conditions of this permit in accordance with 326 IAC 2-7-5(9). No prior notification of IDEM, OAM or U.S. EPA is required.
- (e) Backup fuel switches specifically addressed in, and limited under, Section D of this permit shall not be considered alternative operating scenarios. Therefore, the notification requirements of part (a) of this condition do not apply.

B.23 Construction Permit Requirement [326 IAC 2]

Except as allowed by Indiana P.L. 130-1996 Section 12, as amended by P.L. 244-1997, modification, construction, or reconstruction shall be approved as required by and in accordance with 326 IAC 2.

B.24 Inspection and Entry [326 IAC 2-7-6(2)]

Upon presentation of proper identification cards, credentials, and other documents as may be required by law, the Permittee shall allow IDEM, OAM, VCAPC, and U.S. EPA, or an authorized representative to perform the following:

- (a) Enter upon the Permittee's premises where a Part 70 source is located, or emissions related activity is conducted, or where records must be kept under the conditions of this permit;
- (b) Have access to and copy, at reasonable times, any records that must be kept under the conditions of this permit;
- (c) Inspect, at reasonable times, any facilities, equipment (including monitoring and air pollution control equipment), practices, or operations regulated or required under this permit;

- (d) Sample or monitor, at reasonable times, substances or parameters for the purpose of assuring compliance with this permit or applicable requirements; and
- (e) Utilize any photographic, recording, testing, monitoring, or other equipment for the purpose of assuring compliance with this permit or applicable requirements.
[326 IAC 2-7-6(6)]
 - (1) The Permittee may assert a claim that, in the opinion of the Permittee, information removed or about to be removed from the source by IDEM, OAM, VCAPC or an authorized representative, contains information that is confidential under IC 5-14-3-4(a). The claim shall be made in writing before or at the time the information is removed from the source. In the event that a claim of confidentiality is so asserted, neither IDEM, OAM, VCAPC, nor an authorized representative, may disclose the information unless and until IDEM, OAM, and VCAPC makes a determination under 326 IAC 17-1-7 through 326 IAC 17-1-9 that the information is not entitled to confidential treatment and that determination becomes final. [IC 5-14-3-4; IC 13-14-11-3; 326 IAC 17-1-7 through 326 IAC 17-1-9]
 - (2) The Permittee, IDEM, OAM, and VCAPC acknowledge that the federal law applies to claims of confidentiality made by the Permittee with regard to information removed or about to be removed from the source by U.S. EPA. [40 CFR Part 2, Subpart B]

B.25 Transfer of Ownership or Operation [326 IAC 2-1-6] [326 IAC 2-7-11]

Pursuant to 326 IAC 2-1-6 and 326 IAC 2-7-11:

- (a) In the event that ownership of this source is changed, the Permittee shall notify IDEM, OAM, Permits Branch and VCAPC, within thirty (30) days of the change. Notification shall include a written agreement containing a specific date for transfer of permit responsibility, coverage, and liability between the Permittee and the new owner.
- (b) The written notification shall be sufficient to transfer the permit to the new owner by an administrative amendment pursuant to 326 IAC 2-7-11. The notification which shall be submitted by the Permittee does not require the certification by the "responsible official" as defined by 326 IAC 2-7-1(34).
- (c) IDEM, OAM and VCAPC shall reserve the right to issue a new permit.

B.26 Annual Fee Payment [326 IAC 2-7-19] [326 IAC 2-7-5(7)]

- (a) The Permittee shall pay annual fees to IDEM, OAM, and VCAPC, within thirty (30) calendar days of receipt of a billing. If the Permittee does not receive a bill from IDEM, OAM and VCAPC the applicable fee is due April 1 of each year.
- (b) Failure to pay may result in administrative enforcement action, or revocation of this permit.
- (c) The Permittee may call the following telephone numbers: 1-800-451-6027 or 317-233-0425 (ask for OAM, Technical Support and Modeling Section), to determine the appropriate permit fee.

B.27 Enhanced New Source Review [326 IAC 2]

The requirements of the construction permit rules in 326 IAC 2 are satisfied by this permit for any previously unpermitted facilities and facilities to be constructed within eighteen (18) months after the date of issuance of this permit, as listed in Sections A.2 and A.3.

SECTION C

SOURCE OPERATION CONDITIONS

Entire Source

Emission Limitations and Standards [326 IAC 2-7-5(1)]

C.1 PSD Minor Source Status [326 IAC 2-2][40 CFR 52.21]

The total source potential to emit of volatile organic compounds (VOC) is less than 250 tons per year. Therefore the requirements of 326 IAC 2-2 (Prevention of Significant Deterioration) and 40 CFR 52.21 will not apply.

C.2 Particulate Matter Emission Limitations For Processes with Process Weight Rates Less Than One Hundred (100) pounds per hour [326 IAC 6-3-2(c)]

Pursuant to 326 IAC 6-3-2(c), the allowable particulate matter emissions rate from any process not already regulated by 326 IAC 6-1 or any New Source Performance Standard, and which has a maximum process weight rate less than 100 pounds per hour shall not exceed 0.551 pounds per hour.

C.3 Opacity [326 IAC 5-1]

Pursuant to 326 IAC 5-1-2 (Visible Emissions Limitations), except as provided in 326 IAC 5-1-3 (Temporary Exemptions), visible emissions shall meet the following, unless otherwise stated in this permit:

(a) Visible emissions shall not exceed an average of forty percent (40%) opacity in twenty-four (24) consecutive readings, as determined in 326 IAC 5-1-4.

(b) Visible emissions shall not exceed sixty percent (60%) opacity for more than a cumulative total of fifteen (15) minutes (sixty (60) readings) in a six (6) hour period.

C.4 Open Burning [326 IAC 4-1] [IC 13-17-9]

The Permittee shall not open burn any material except as provided in 326 IAC 4-1-3, 326 IAC 4-1-4 or 326 IAC 4-1-6. The previous sentence notwithstanding, the Permittee may open burn in accordance with an open burning approval issued by the Commissioner under 326 IAC 4-1-4.1. 326 IAC 4-1-3(a)(2)(A) and (B) are not federally enforceable.

C.5 Incineration [326 IAC 4-2][326 IAC 9-1-2]

The Permittee shall not operate an incinerator or incinerate any waste or refuse except as provided in 326 IAC 4-2 and 326 IAC 9-1-2.

C.6 Fugitive Dust Emissions [326 IAC 6-4]

The Permittee shall not allow fugitive dust to escape beyond the property line or boundaries of the property, right-of-way, or easement on which the source is located, in a manner that would violate 326 IAC 6-4 (Fugitive Dust Emissions). 326 IAC 6-4-2(4) is not federally enforceable.

C.7 Operation of Equipment [326 IAC 2-7-6(6)]

All air pollution control equipment listed in this permit and used to comply with an applicable requirement shall be operated at all times that the emission unit vented to the control equipment is in operation.

C.8 Asbestos Abatement Projects [326 IAC 14-10] [326 IAC 18] [40 CFR 61.140]

(a) Notification requirements apply to each owner or operator. If the combined amount of regulated asbestos containing material (RACM) to be stripped, removed or disturbed is at least 260 linear feet on pipes or 160 square feet on other facility components, or at least thirty-five (35) cubic feet on all facility components, then the notification requirements of 326 IAC 14-10-3 are mandatory. All demolition projects require notification whether or not asbestos is present.

- (b) The Permittee shall ensure that a written notification is sent on a form provided by the Commissioner at least ten (10) working days before asbestos stripping or removal work or before demolition begins, per 326 IAC 14-10-3, and shall update such notice as necessary, including, but not limited to the following:
 - (1) When the amount of affected asbestos containing material increases or decreases by at least twenty percent (20%); or
 - (2) If there is a change in the following:
 - (A) Asbestos removal or demolition start date;
 - (B) Removal or demolition contractor; or
 - (C) Waste disposal site.
- (c) The Permittee shall ensure that the notice is postmarked or delivered according to the guidelines set forth in 326 IAC 14-10-3(2).
- (d) The notice to be submitted shall include the information enumerated in 326 IAC 14-10-3(3).

All required notifications shall be submitted to:

Indiana Department of Environmental Management
Asbestos Section, Office of Air Management
100 North Senate Avenue, P.O. Box 6015
Indianapolis, Indiana 46206-6015

and

Vigo County Air Pollution Control
201 Cherry Street
Terre Haute, Indiana 47807

The notifications do not require a certification by the "responsible official" as defined by 326 IAC 2-7-1(34).

- (e) **Procedures for Asbestos Emission Control**
The Permittee shall comply with the emission control procedures in 326 IAC 14-10-4 and 40 CFR 61.145(c). Per 326 IAC 14-10-4 emission control requirements are mandatory for any removal or disturbance of RACM greater than three (3) linear feet on pipes or three (3) square feet on any other facility components or a total of at least 0.75 cubic feet on all facility components.
- (f) **Indiana Accredited Asbestos Inspector**
The Permittee shall comply with 326 IAC 14-10-1(a) that requires the owner or operator, prior to a renovation/demolition, to use an Indiana Accredited Asbestos Inspector to thoroughly inspect the affected portion of the facility for the presence of asbestos. The requirement that the inspector be accredited is federally enforceable.

Testing Requirements [326 IAC 2-7-6(1)]

C.9 Performance Testing [326 IAC 3-6]

- (a) All testing shall be performed according to the provisions of 326 IAC 3-6 (Source Sampling Procedures), except as provided elsewhere in this permit, utilizing methods approved by IDEM, OAM.

A test protocol, except as provided elsewhere in this permit, shall be submitted to:

Indiana Department of Environmental Management
Compliance Data Section, Office of Air Management
100 North Senate Avenue, P. O. Box 6015
Indianapolis, Indiana 46206-6015

and

Vigo County Air Pollution Control
201 Cherry Street
Terre Haute, Indiana 47807

no later than thirty-five (35) days prior to the intended test date. The Permittee shall submit a notice of the actual test date to the above address so that it is received at least two weeks prior to the test date.

- (b) All test reports must be received by IDEM, OAM within forty-five (45) days after the completion of the testing. An extension may be granted by the Commissioner, if the source submits to IDEM, OAM, a reasonable written explanation within five (5) days prior to the end of the initial forty-five (45) day period.

The documentation submitted by the Permittee does not require certification by the "responsible official" as defined by 326 IAC 2-7-1(34).

Compliance Monitoring Requirements [326 IAC 2-7-5(1)] [326 IAC 2-7-6(1)]

C.10 Compliance Monitoring [326 IAC 2-7-5(3)] [326 IAC 2-7-6(1)]

Compliance with applicable requirements shall be documented as required by this permit. The Permittee shall be responsible for installing any necessary equipment and initiating any required monitoring related to that equipment, no more than ninety (90) days after receipt of this permit. If due to circumstances beyond its control, this schedule cannot be met, the Permittee may extend compliance schedule an additional ninety (90) days provided the Permittee notify:

Indiana Department of Environmental Management
Compliance Branch, Office of Air Management
100 North Senate Avenue, P. O. Box 6015
Indianapolis, Indiana 46206-6015

and

Vigo County Air Pollution Control
201 Cherry Street
Terre Haute, Indiana 47807

in writing, prior to the end of the initial ninety (90) day compliance schedule, with full justification of the reasons for the inability to meet this date.

The notification which shall be submitted by the Permittee does require the certification by the "responsible official" as defined by 326 IAC 2-7-1(34).

C.11 Maintenance of Monitoring Equipment [326 IAC 2-7-5(3)(A)(iii)]

- (a) In the event that a breakdown of the monitoring equipment occurs, a record shall be made of the times and reasons of the breakdown and efforts made to correct the problem. To the extent practicable, supplemental or intermittent monitoring of the parameter should be implemented at intervals no less frequent than required in Section D of this permit until such time as the monitoring equipment is back in operation.

In the case of continuous monitoring, supplemental or intermittent monitoring of the parameter should be implemented at intervals no less than one (1) hour until such time as the continuous monitor is back in operation.

- (b) The Permittee shall install, calibrate, quality assure, maintain, and operate all necessary monitors and related equipment. In addition, prompt corrective action shall be initiated whenever indicated.

C.12 Monitoring Methods [326 IAC 3]

Any monitoring or testing performed to meet the applicable requirements of this permit shall be performed according to the provisions of 326 IAC 3, or 40 CFR 60, Appendix A, or other approved methods as specified in this permit.

C.13 Pressure Gauge Specifications

Whenever a condition in this permit requires the measurement of pressure drop across any part of the unit or its control device, the gauge employed shall have a scale such that the expected normal reading shall be no less than twenty percent (20%) of full scale and be accurate within plus or minus two percent ($\pm 2\%$) of full scale reading.

C.14 Compliance Schedule [326 IAC 2-7-6(3)]

The Permittee:

- (a) Has certified that all facilities at this source are in compliance with all applicable requirements; and
- (b) Has submitted a statement that the Permittee will continue to comply with such requirements; and
- (c) Will comply with such applicable requirements that become effective during the term of this permit.

Corrective Actions [326 IAC 2-7-5] [326 IAC 2-7-6]

C.15 Risk Management Plan [326 IAC 2-7-5(12)] [40 CFR 68.215]

If a regulated substance, subject to 40 CFR 68, is present in a process in more than the threshold quantity, 40 CFR 68 is an applicable requirement and the Permittee shall:

- (a) Submit:
 - (1) A compliance schedule for meeting the requirements of 40 CFR 68 by the date provided in 40 CFR 68.10(a); or
 - (2) As a part of the compliance certification submitted under 326 IAC 2-7-6(5), a certification statement that the source is in compliance with all the requirements of 40 CFR 68, including the registration and submission of a Risk Management Plan (RMP); and
 - (3) A verification to IDEM, OAM and VCAPC that a RMP or a revised plan was prepared and submitted as required by 40 CFR 68.
- (b) Provide annual certification to IDEM, OAM, and VCAPC that the Risk Management Plan is being properly implemented.

All documents submitted pursuant to this condition shall include the certification by the "responsible official" as defined by 326 IAC 2-7-1(34).

C.16 Compliance Monitoring Plan - Failure to Take Response Steps [326 IAC 2-7-5][326 IAC 2-7-6][326 IAC 1-6]

- (a) The Permittee is required to implement a compliance monitoring plan to ensure that reasonable information is available to evaluate its continuous compliance with applicable requirements. This compliance monitoring plan is comprised of:

- (1) This condition;
- (2) The Compliance Determination Requirements in Section D of this permit;
- (3) The Compliance Monitoring Requirements in Section D of this permit;
- (4) The Record Keeping and Reporting Requirements in Section C (Monitoring Data Availability, General Record Keeping Requirements, and General Reporting Requirements) and in Section D of this permit; and
- (5) A Compliance Response Plan (CRP) for each compliance monitoring condition of this permit. CRP's shall be submitted to IDEM, OAM and VCAPC upon request and shall be subject to review and approval by IDEM, OAM, and VCAPC. The CRP shall be prepared within ninety (90) days after issuance of this permit by the Permittee and maintained on site, and is comprised of:
 - (A) Response steps that will be implemented in the event that compliance related information indicates that a response step is needed pursuant to the requirements of Section D of this permit; and
 - (B) A time schedule for taking such response steps including a schedule for devising additional response steps for situations that may not have been predicted.
- (b) For each compliance monitoring condition of this permit, appropriate response steps shall be taken when indicated by the provisions of that compliance monitoring condition. Failure to perform the actions detailed in the compliance monitoring conditions or failure to take the response steps within the time prescribed in the Compliance Response Plan, shall constitute a violation of the permit unless taking the response steps set forth in the Compliance Response Plan would be unreasonable.
- (c) After investigating the reason for the excursion, the Permittee is excused from taking further response steps for any of the following reasons:
 - (1) The monitoring equipment malfunctioned, giving a false reading. This shall be an excuse from taking further response steps providing that prompt action was taken to correct the monitoring equipment.
 - (2) The Permittee has determined that the compliance monitoring parameters established in the permit conditions are technically inappropriate, has previously submitted a request for an administrative amendment to the permit, and such request has not been denied or;
 - (3) An automatic measurement was taken when the process was not operating; or
 - (4) The process has already returned to operating within "normal" parameters and no response steps are required.
- (d) Records shall be kept of all instances in which the compliance related information was not met and of all response steps taken. In the event of an emergency, the provisions of 326 IAC 2-7-16 (Emergency Provisions) requiring prompt corrective action to mitigate emissions shall prevail.

C.17 Actions Related to Noncompliance Demonstrated by a Stack Test [326 IAC 2-7-5][326 IAC 2-7-6]

- (a) When the results of a stack test performed in conformance with Section C - Performance Testing, of this permit exceed the level specified in any condition of this permit, the Permittee shall take appropriate corrective actions. The Permittee shall submit a description of these corrective actions to IDEM, OAM, within thirty (30) days of receipt of the test results. The Permittee shall take appropriate action to minimize emissions from the affected facility while the corrective actions are being implemented. IDEM, OAM shall notify the Permittee within thirty (30) days, if the corrective actions taken are deficient. The Permittee shall submit a description of additional corrective actions taken to IDEM, OAM within thirty (30) days of receipt of the notice of deficiency.

IDEM, OAM reserves the authority to use enforcement activities to resolve noncompliant stack tests.

- (b) A retest to demonstrate compliance shall be performed within one hundred twenty (120) days of receipt of the original test results. Should the Permittee demonstrate to IDEM, OAM that retesting in one-hundred and twenty (120) days is not practicable, IDEM, OAM may extend the retesting deadline. Failure of the second test to demonstrate compliance with the appropriate permit conditions may be grounds for immediate revocation of the permit to operate the affected facility.

The document submitted pursuant to this condition do not require the certification by the "responsible official" as defined by 326 IAC 2-7-1(34).

Record Keeping and Reporting Requirements [326 IAC 2-7-5(3)] [326 IAC 2-7-19]

C.18 Emission Statement [326 IAC 2-7-5(3)(C)(iii)][326 IAC 2-7-5(7)][326 IAC 2-7-19(c)][326 IAC 2-6] [326 IAC 2-7-19 (e)]

- (a) The Permittee shall submit an annual emission statement certified pursuant to the requirements of 326 IAC 2-6, that must be received by July 1 of each year and must comply with the minimum requirements specified in 326 IAC 2-6-4. The annual emission statement shall meet the following requirements:

- (1) Indicate actual emissions of criteria pollutants from the source, in compliance with 326 IAC 2-6 (Emission Reporting);
- (2) Indicate actual emissions of other regulated pollutants from the source, for purposes of Part 70 fee assessment.

- (b) The annual emission statement covers the twelve (12) consecutive month time period starting January 1 and ending December 31. The annual emission statement must be submitted to:

Indiana Department of Environmental Management
Technical Support and Modeling Section, Office of Air Management
100 North Senate Avenue, P. O. Box 6015
Indianapolis, Indiana 46206-6015

and

Vigo County Air Pollution Control
201 Cherry Street
Terre Haute, Indiana 47807

- (c) The annual emission statement required by this permit shall be considered timely if the date postmarked on the envelope or certified mail receipt, or affixed by the shipper on the private shipping receipt, is on or before the date it is due. If the document is submitted by any other means, it shall be considered timely if received by IDEM, OAM, and VCAPC on or before the date it is due.

C.19 Monitoring Data Availability [326 IAC 2-7-6(1)] [326 IAC 2-7-5(3)]

- (a) With the exception of performance tests conducted in accordance with Section C- Performance Testing, all observations, sampling, maintenance procedures, and record keeping, required as a condition of this permit shall be performed at all times the equipment is operating at normal representative conditions.
- (b) As an alternative to the observations, sampling, maintenance procedures, and record keeping of subsection (a) above, when the equipment listed in Section D of this permit is not operating, the Permittee shall either record the fact that the equipment is shut down or perform the observations, sampling, maintenance procedures, and record keeping that would otherwise be required by this permit.
- (c) If the equipment is operating but abnormal conditions prevail, additional observations and sampling should be taken with a record made of the nature of the abnormality.

- (d) If for reasons beyond its control, the operator fails to make required observations, sampling, maintenance procedures, or record keeping, reasons for this must be recorded.
- (e) At its discretion, IDEM and VCAPC may excuse such failure providing adequate justification is documented and such failures do not exceed five percent (5%) of the operating time in any quarter.
- (f) Temporary, unscheduled unavailability of staff qualified to perform the required observations, sampling, maintenance procedures, or record keeping shall be considered a valid reason for failure to perform the requirements stated in (a) above.

C.20 General Record Keeping Requirements [326 IAC 2-7-5(3)][326 IAC 2-7-6]

- (a) Records of all required monitoring data and support information shall be retained for a period of at least five (5) years from the date of monitoring sample, measurement, report, or application. These records shall be kept at the source location for a minimum of three (3) years and available upon the request of an IDEM, OAM and VCAPC representative. The records may be stored elsewhere for the remaining two (2) years as long as they are available upon request. If the Commissioner makes a written request for records to the Permittee, the Permittee shall furnish the records to the Commissioner within a reasonable time.
- (b) Records of required monitoring information shall include, where applicable:
 - (1) The date, place, and time of sampling or measurements;
 - (2) The dates analyses were performed;
 - (3) The company or entity performing the analyses;
 - (4) The analytic techniques or methods used;
 - (5) The results of such analyses; and
 - (6) The operating conditions existing at the time of sampling or measurement.
- (c) Support information shall include, where applicable:
 - (1) Copies of all reports required by this permit;
 - (2) All original strip chart recordings for continuous monitoring instrumentation;
 - (3) All calibration and maintenance records;
 - (4) Records of preventive maintenance shall be sufficient to demonstrate that improper maintenance did not cause or contribute to a violation of any limitation on emissions or potential to emit. To be relied upon subsequent to any such violation, these records may include, but are not limited to: work orders, parts inventories, and operator's standard operating procedures. Records of response steps taken shall indicate whether the response steps were performed in accordance with the Compliance Response Plan required by Section C - Compliance Monitoring Plan - Failure to take Response Steps, of this permit, and whether a deviation from a permit condition was reported. All records shall briefly describe what maintenance and response steps were taken and indicate who performed the tasks.
- (d) All record keeping requirements not already legally required shall be implemented within ninety (90) days of permit issuance.

C.21 General Reporting Requirements [326 IAC 2-7-5(3)(C)]

- (a) To affirm that the source has met all the compliance monitoring requirements stated in this permit the source shall submit a Quarterly Compliance Monitoring Report. Any deviation from the requirements and the date(s) of each deviation must be reported.

- (b) The reports required in (a) of this conditions and reports required by Conditions in Section D of this permit shall be submitted to:

Indiana Department of Environmental Management
Compliance Data Section, Office of Air Management
100 North Senate Avenue, P. O. Box 6015
Indianapolis, Indiana 46206-6015

and

Vigo County Air Pollution Control
201 Cherry Street
Terre Haute, Indiana 47807

- (c) Unless otherwise specified in this permit, any notice, report, or other submission required by this permit shall be considered timely if the date postmarked on the envelope or certified mail receipt, or affixed by the shipper on the private shipping receipt, is on or before the date it is due. If the document is submitted by any other means, it shall be considered timely if received by IDEM, OAM, and VCAPC on or before the date it is due.
- (d) Unless otherwise specified in this permit, any quarterly report shall be submitted within thirty (30) days of the end of the reporting period.
- (e) All instances of deviations as described in Section B-Deviations from Permit Requirements Conditions must be clearly identified in such reports.
- (f) Any corrective actions or response steps taken as a result of each deviation must be clearly identified in such reports.
- (g) The first report shall cover the period commencing on the date of issuance of this permit and ending on the last day of the reporting period.

The documents submitted pursuant to this condition do not require the certification by the "responsible official" as defined by 326 IAC 2-7-1(34).

Stratospheric Ozone Protection

C.22 Compliance with 40 CFR 82 and 326 IAC 22-1

Pursuant to 40 CFR 82 (Protection of Stratospheric Ozone), Subpart F, except as provided for motor vehicle air conditioners in Subpart B, the Permittee shall comply with the standards for recycling and emissions reduction:

- (a) Persons opening appliances for maintenance, service, repair, or disposal must comply with the required practices pursuant to 40 CFR 82.156.
- (b) Equipment used during the maintenance, service, repair, or disposal of appliances must comply with the standards for recycling and recovery equipment pursuant to 40 CFR 82.158.
- (c) Persons performing maintenance, service, repair, or disposal of appliances must be certified by an approved technician certification program pursuant to 40 CFR 82.161.

SECTION D.1

FACILITY OPERATION CONDITIONS

Facility Description [326 IAC 2-7-5(15)]

Two (2) natural gas fired boilers with #2 fuel oil as backup fuel, identified as, B-101 and B-102, respectively, with a maximum capacity of 16.6 million (MM) British thermal unit (Btu) per hour heat input each, and exhausting at two (2) stacks (STK-B1 and STK-B2).

Emission Limitations and Standards [326 IAC 2-7-5(1)]

D.1.1 Sulfur Dioxide (SO₂) [326 IAC 7-1.1-1] [326 IAC 12-1]

(a) Pursuant to 326 IAC 7-1.1 (SO₂ Emissions Limitations) and 40 CFR 60, Subpart Dc (Standards of Performance for Small Industrial-Commercial-Institutional Steam Generating Units):

- (I) The SO₂ emissions from the two (2) 16.6 million (MM) Btu per hour #2 fuel oil/natural gas boilers shall not exceed five tenths (0.5) pounds per million Btu heat input; or
- (ii) The sulfur content of the fuel oil shall not exceed five-tenths percent (0.5%) by weight. [40 CFR 60.42c(d)]

Pursuant to 40 CFR 60 Subpart Dc, the fuel oil sulfur content limit applies at all times, including periods of startup, shutdown, and malfunction.

D.1.2 Particulate Matter (PM) [326 IAC 6-2-4]

Pursuant to 326 IAC 6-2-4 (Emission Limitations), particulate emissions from the two (2) boilers shall be limited to 0.44 pounds per million (MM) Btu heat input. The emissions limitations are calculated as follows:

$$Pt = 1.09/(Q)^{0.26} \quad \text{Where: } Pt = \text{pounds of particulate matter emitted per million Btu heat input.}$$

Q = total source maximum operating capacity rating in million Btu per hour heat input.

D.1.3 No.2 fuel oil consumption limitation

The amount of fuel oil No.2 combusted in the two boilers shall be limited to 1,115,493 gallons per year (as determined in CP 167-3685), based on 0.5 percent sulfur content. This will make the Emission Offset rules, 326 IAC 2-3, and 40 CFR 51.18(j) not applicable.

D.1.4 Preventive Maintenance Plan [326 IAC 2-8-4(9)]

A Preventive Maintenance Plan, in accordance with Section B - Preventive Maintenance Plan, of this permit, is required for this facility and any control devices.

Compliance Determination Requirements

D.1.5 Testing Requirements [326 IAC 2-7-6(1),(6)]

The Permittee is not required to test this facility by this permit. However, IDEM and VCAPC may require compliance testing at any specific time when necessary to determine if the facility is in compliance. If testing is required by IDEM, compliance with the Particulate Matter limit specified in Condition D.1.2 shall be determined by a performance test conducted in accordance with Section C - Performance Testing.

D.1.6 Sulfur Dioxide Emissions and Sulfur Content

Pursuant to 40 CFR 60, Subpart Dc, the Permittee shall demonstrate compliance utilizing one of the following options:

- (a) Providing vendor analysis of fuel delivered, if accompanied by a certification; or
- (b) Analyzing the oil sample to determine the sulfur content of the oil via the procedures in 40 CFR 60, Appendix A, Method 19.
 - (1) Oil samples may be collected from the fuel tank immediately after the fuel tank is filled and before any oil is combusted; and

- (2) If a partially empty fuel tank is refilled, a new sample and analysis would be required upon filling.

Compliance Monitoring Requirements [326 IAC 2-7-6(1)] [326 IAC 2-7-5(1)]

D.1.7 Visible Emissions Notations

- (a) Daily visible emission notations of the two (2) boiler stacks exhaust shall be performed during normal daylight operations. A trained employee shall record whether emissions are normal or abnormal.
- (b) For processes operated continuously, "normal" means those conditions prevailing, or expected to prevail, eighty percent (80%) of the time the process is in operation, not counting startup or shut down time.
- (c) In the case of batch or discontinuous operations, readings shall be taken during that part of the operation that would normally be expected to cause the greatest emissions.
- (d) A trained employee is an employee who has worked at the plant at least one (1) month and has been trained in the appearance and characteristics of normal visible emissions for that specific process.
- (e) The Compliance Response Plan for this unit shall contain troubleshooting contingency and response steps for when an abnormal emission is observed.

Record Keeping and Reporting Requirements [326 IAC 2-7-5(3)] [326 IAC 2-7-19]

D.1.8 Record Keeping Requirements

- (a) To document compliance with Condition D.1.1, the Permittee shall maintain records in accordance with (1) through (6) below. Note that pursuant to 40 CFR 60 Subpart Dc, the fuel oil sulfur limit applies at all times including periods of startup, shutdown, and malfunction.
- (1) Calendar dates covered in the compliance determination period;
- (2) Actual usage since last compliance determination period and value calculated per limitation;
- (3) A certification, signed by the owner or operator, that the records of the fuel supplier certifications represent all of the fuel combusted during the period; and

If the fuel supplier certification is used to demonstrate compliance the following, as a minimum, shall be maintained:

- (4) Fuel supplier certifications.
- (5) The name of the fuel supplier; and
- (6) A statement from the fuel supplier that certifies the sulfur content of the fuel oil.

The Permittee shall retain records of all recording/monitoring data and support information for a period of five (5) years, or longer if specified elsewhere in this permit, from the date of the monitoring sample, measurement, or report. Support information includes all calibration and maintenance records and all original strip-chart recordings for continuous monitoring instrumentation, and copies of all reports required by this permit.

- (b) All records shall be maintained in accordance with Section C - General Record Keeping Requirements, of this permit.
- (c) To document compliance with Condition D.1.7, the Permittee shall maintain records of daily visible emission notations of the boiler stacks exhaust.

D.1.9 Reporting Requirements

- (a) A quarterly summary of the information to document compliance with Condition D.1.3 shall be submitted to the addresses listed in Section C - General Reporting Requirements, using the reporting forms located at the end of this permit, or their equivalent, within thirty (30) days after the end of the quarter being reported.
- (b) A summary of the information to document compliance with the following conditions: D.1.2 and D.1.7. These reports should be made available upon request to IDEM, OAM and VCAPC.
- (c) The natural gas boiler certification to document compliance with Condition D.1.2 when the boiler is burning natural gas, shall be submitted quarterly to the address listed in Section C - General Requirements, of this permit.

SECTION D.2

FACILITY OPERATION CONDITIONS

Facility Description [326 IAC 2-7-5(15)]

A Clinacox pharmaceutical premix feed blending/bagging facility capable of producing six (6) 5,000 pound batches per day, exhausting at three (3) stacks (STK-C1, STK-C2, and STK-C3). The facility will include the following dust collectors:

- a) Receiving Silo Dust Collector, DC-101 (also referred to as BH-10), b) Process Silo Dust Collector, DC-102 (also referred to as BH-11), c) Ribbon Blender Dust Collector, DC-201 (also referred to as BH-12), d) Product Bagging Dust Collector, DC-301 (also referred to as BH-13), e) Weighing & Mixing Dust Collector, DC-401 (also referred to as BH-14).

Emission Limitations and Standards [326 IAC 2-7-5(1)]

D.2.1 Particulate Matter (PM) [326 IAC 6-3]

Pursuant to 326 IAC 6-3 (Process Operations) and Construction Permit 167-1916, the allowable PM emission rate from the Clinacox facility shall be limited to 3.4 pounds per hour from the following equation:

$$E = 4.10(P^{0.67}) \quad \text{where: } E = \text{rate of emission in lbs/hr and} \\ P = \text{process weight in tons/hr.}$$

D.2.2 Preventive Maintenance Plan [326 IAC 2-7-4(c)(9)]

A Preventive Maintenance Plan, in accordance with Section B - Preventive Maintenance Plan, of this permit, is required for this facility and its control device.

Compliance Determination Requirements

D.2.3 Testing Requirements [326 IAC 2-7-6(1),(6)]

The Permittee is not required to test this facility by this permit. However, IDEM and VCAPC may require compliance testing at any specific time when necessary to determine if the facility is in compliance. If testing is required by IDEM, compliance with the Particulate Matter limit specified in Condition D.2.1 shall be determined by a performance test conducted in accordance with Section C - Performance Testing.

D.2.4 Particulate Matter (PM) Control

The dust collectors shall be in operation at all times when the Clinacox facility is in operation.

Compliance Monitoring Requirements [326 IAC 2-7-6(1)] [326 IAC 2-7-5(1)]

D.2.5 Visible Emissions Notations

- (a) Visible emission notations for dust collectors DC-201, DC-301, and DC-401 shall be performed daily during normal daylight operation, when the process is in operation. Visible emission notations for dust collectors DC-101 and DC-102 shall be performed during normal daylight operation, when materials are being transferred.
- (b) For processes operated continuously, "normal" means those conditions prevailing, or expected to prevail, eighty percent (80%) of the time the process is in operation, not counting startup or shut down time.

- (c) In the case of batch or discontinuous operations, readings shall be taken during that part of the operation that would normally be expected to cause the greatest emissions.
- (d) A trained employee is an employee who has worked at the plant at least one (1) month and has been trained in the appearance and characteristics of normal visible emissions for that specific process.
- (e) The Compliance Response Plan for this unit shall contain troubleshooting contingency and response steps for when an abnormal emission is observed.

D.2.6 Parametric Monitoring

The Permittee shall record the total static pressure drop across the five (5) dust collectors used in conjunction with the Clinacox process, at least once weekly when the process is in operation when venting to the atmosphere. Unless operated under conditions for which the Preventive Maintenance Plan specifies otherwise, the pressure drop across the dust collectors shall be maintained within the range of **0.0 and 5.0** inches of water or a range established during the latest stack test. The Preventive Maintenance Plan for this unit shall contain troubleshooting contingency and corrective actions for when the pressure reading is outside of the above mentioned range for any one reading.

The instrument used for determining the pressure shall comply with Section C - Pressure Gauge Specifications, of this permit, shall be subject to approval by IDEM, OAM, and Vigo County Air Pollution Control and shall be calibrated at least once every six (6) months.

D.2.7 Broken Bag or Failure Detection

In the event that bag failure has been observed:

- (a) The affected compartments will be shut down immediately until the failed units have been repaired or replaced.
- (b) Within eight (8) hours of the determination of failure, response steps according to the timetable described in the Compliance Response Plan shall be initiated. For any failure with corresponding response steps and timetable not described in the Compliance Response Plan, response steps shall be devised within eight (8) hours of discovery of the failure and shall include a timetable for completion.

Record Keeping and Reporting Requirements [326 IAC 2-7-5(3)] [326 IAC 2-7-19]

D.2.8 Record Keeping Requirements

- (a) To document compliance with Condition D.2.5, the Permittee shall maintain records of daily visible emission notations of the Clinacox stacks.
- (b) To document compliance with Condition D.2.6, the Permittee shall maintain the following:
 - (1) Daily records of the following operational parameters during normal operation when venting to the atmosphere:
 - (A) Inlet and outlet differential static pressure; and
 - (B) Cleaning cycle: frequency and differential pressure.
 - (2) Documentation of all corrective actions implemented, per event.
 - (3) Operation and preventive maintenance logs, including work purchase orders, shall be maintained.
 - (4) Quality Assurance/Quality Control (QA/QC) procedures.
 - (5) Operator standard operating procedures (SOP).
 - (6) Manufacturer's specifications or its equivalent.
 - (7) Equipment "troubleshooting" contingency plan.
 - (8) Documentation of the dates vents are redirected.

SECTION D.3 FACILITY OPERATION CONDITIONS

Facility Description [326 IAC 2-7-5(15)]

One (1) salt solution storage tank with a 1,000 cubic foot capacity and two (2) wet scrubbers for dust control. Emissions exhaust to one (1) stack (STK-S1).

Emission Limitations and Standards [326 IAC 2-7-5(1)]

D.3.1 Particulate Matter (PM) [326 IAC 6-3]

Pursuant to 326 IAC 6-3 (Process Operations), the allowable PM emission rate from the salt solution storage tank facility shall not exceed 30.5 pounds per hour when operating at a process weight rate of 40,000 pounds per hour.

The pounds per hour limitation was calculated with the following equation:

Interpolation and extrapolation of the data for the process weight rate up to 60,000 pounds per hour shall be accomplished by use of the equation:

$$E = 4.10 P^{0.67}$$

where E = rate of emission in pounds per hour; and
P = process weight rate in tons per hour

D.3.2 Preventive Maintenance Plan [326 IAC 2-7-4(c)(9)]

A Preventive Maintenance Plan, in accordance with Section B - Preventive Maintenance Plan, of this permit, is required for this facility and its control device.

Compliance Determination Requirements

D.3.3 Testing Requirements [326 IAC 2-7-6(1),(6)]

The Permittee is not required to test this facility by this permit. However, IDEM and VCAPC may require compliance testing at any specific time when necessary to determine if the facility is in compliance. If testing is required by IDEM, compliance with the Particulate Matter limit specified in Condition D.3.1 shall be determined by a performance test conducted in accordance with Section C - Performance Testing.

D.3.4 Particulate Matter (PM) Control

The wet scrubbers shall be in operation at all times during the transfer of salt into the storage tank.

Compliance Monitoring Requirements [326 IAC 2-7-6(1)] [326 IAC 2-7-5(1)]

D.3.5 Visible Emissions Notations

- (a) Daily visible emission notations of the one (1) salt solution storage stack shall be performed during normal daylight operations. A trained employee shall record whether emissions are normal or abnormal.
- (b) For processes operated continuously, "normal" means those conditions prevailing, or expected to prevail, eighty percent (80%) of the time the process is in operation, not counting startup or shut down time.
- (c) In the case of batch or discontinuous operations, readings shall be taken during that part of the operation that would normally be expected to cause the greatest emissions.
- (d) A trained employee is an employee who has worked at the plant at least one (1) month and has been trained in the appearance and characteristics of normal visible emissions for that specific process.
- (e) The Compliance Response Plan for this unit shall contain troubleshooting contingency and response steps for when an abnormal emission is observed.

D.3.6 Scrubber(s) Operating Condition

That the scrubber(s) shall be operated at all times when the loading and unloading of salt, for the salt storage system, is in progress.

- (a) The Permittee shall monitor and record the pressure drop across the scrubber(s) during each transfer of salt into the salt storage tank. The Preventive Maintenance Plan for the scrubber(s) shall contain troubleshooting contingency and corrective actions for when the pressure drop and flow rate readings are outside of the normal range for any one reading.
- (b) The instruments used for determining the pressure drop and flow rate shall be subject to approval by IDEM, OAM and VCAPC, and shall be calibrated at least once every six (6) months.
- (c) The gauge employed to take the pressure drop across the scrubber or any part of the facility shall have a scale such that the expected normal reading shall be no less than 20 percent of full scale and be accurate within $\pm 2\%$ of full scale reading. The instrument shall be quality assured and maintained as specified by the vendor.
- (d) An inspection shall be performed each calendar quarter of the scrubber. Defective scrubber part(s) shall be replaced. A record shall be kept of the results of the inspection and the number of scrubber part(s) replaced.
- (e) In the event that a failure of the scrubber(s) has been observed:
 - (1) The affected process will be shut down immediately until the failed unit has been replaced.
 - (2) Based upon the findings of the inspection, any additional corrective actions will be devised within eight (8) hours of discovery and will include a timetable for completion.

Record Keeping and Reporting Requirements [326 IAC 2-7-5(3)] [326 IAC 2-7-19]

D.3.7 Record Keeping Requirements

- (a) To document compliance with Condition D.3.5, the Permittee shall maintain records of visible emissions notations of the salt solution storage exhausts, taken during the transfer of salt into the salt storage tank.
- (b) To document compliance with Condition D.3.6, the Permittee shall maintain records of the pressure drop, flow rate, and replaced parts for the scrubber(s).

SECTION D.4

FACILITY OPERATION CONDITIONS

Facility Description [326 IAC 2-7-5(15)]

A Zeranol pharmaceutical producing operation used for the production of Ralgro®, a cattle growth promotant. This facility has maximum potential capacity of 132 batches per year. The process contains two (2) dust collectors (DC-202, and DC-203) with the emissions exhausting to stacks STK-202 and STK-203, respectively.

Emission Limitations and Standards [326 IAC 2-7-5(1)]

D.4.1 Particulate Matter (PM) [326 IAC 6-3]

Pursuant to 326 IAC 6-3 (Process Operations), the allowable PM emission rate from the Zeranol facility shall not exceed 9.2 pounds per hour.

The pounds per hour limitation was calculated with the following equation:

Interpolation and extrapolation of the data for the process weight rate up to 60,000 pounds per hour shall be accomplished by use of the equation:

$$E = 4.10 P^{0.67}$$

where E = rate of emission in pounds per hour; and
P = process weight rate in tons per hour

D.4.2 Preventive Maintenance Plan [326 IAC 2-7-4(c)(9)]

A Preventive Maintenance Plan, in accordance with Section B - Preventive Maintenance Plan, of this permit, is required for this facility and its control device.

Compliance Determination Requirements

D.4.3 Testing Requirements [326 IAC 2-7-6(1),(6)]

The Permittee is not required to test this facility by this permit. However, IDEM and VCAPC may require compliance testing at any specific time when necessary to determine if the facility is in compliance. If testing is required by IDEM, compliance with the Particulate Matter limit specified in Condition D.4.1 shall be determined by a performance test conducted in accordance with Section C - Performance Testing.

D.4.4 Particulate Matter (PM) Control

The dust collectors shall be in operation at all times when the Zeranol facility is in operation.

Compliance Monitoring Requirements [326 IAC 2-7-6(1)] [326 IAC 2-7-5(1)]

D.4.5 Visible Emissions Notations

- (a) Daily visible emission notations of the two (2) dust/vapor collector exhausts shall be performed during normal daylight operations. A trained employee shall record whether emissions are normal or abnormal.
- (b) For processes operated continuously, "normal" means those conditions prevailing, or expected to prevail, eighty percent (80%) of the time the process is in operation, not counting startup or shut down time.
- (c) In the case of batch or discontinuous operations, readings shall be taken during that part of the operation that would normally be expected to cause the greatest emissions.
- (d) A trained employee is an employee who has worked at the plant at least one (1) month and has been trained in the appearance and characteristics of normal visible emissions for that specific process.
- (e) The Compliance Response Plan for this unit shall contain troubleshooting contingency and response steps for when an abnormal emission is observed.

D.4.6 Parametric Monitoring

The Permittee shall record the total static pressure drop across the two (2) dust collectors used in conjunction with the Zeranol process at least once weekly when the pharmaceutical process is in operation. Unless operated under conditions for which the Preventive Maintenance Plan specifies otherwise, the pressure drop across the dust collectors shall be maintained within the range of **0.0 and 5.0** inches of water or a range established during the latest stack test. The Preventive Maintenance Plan for this unit shall contain troubleshooting contingency and corrective actions for when the pressure reading is outside of the above mentioned range for any one reading.

The instrument used for determining the pressure shall comply with Section C - Pressure Gauge Specifications, of this permit, shall be subject to approval by IDEM, OAM, and Vigo County Air Pollution Control (VCAPC) and shall be calibrated at least once every six (6) months.

D.4.7 Broken Bag or Failure Detection

In the event that bag failure has been observed:

- (a) The affected compartments will be shut down immediately until the failed units have been repaired or replaced.

- (b) Within eight (8) hours of the determination of failure, response steps according to the timetable described in the Preventive Maintenance Plan shall be initiated. For any failure with corresponding response steps and timetable not described in the Preventive Maintenance Plan, response steps shall be devised within eight (8) hours of discovery of the failure and shall include a timetable for completion.

Record Keeping and Reporting Requirements [326 IAC 2-7-5(3)] [326 IAC 2-7-19]

D.4.8 Record Keeping Requirements

- (a) To document compliance with Condition D.4.5, the Permittee shall maintain records of daily visible emission notations of the Zeranol exhausts.
- (b) To document compliance with Condition D.4.6, the Permittee shall maintain the following:
 - (1) Daily records of the following operational parameters during normal operation:
 - (A) Inlet and outlet differential static pressure; and
 - (B) Cleaning cycle: frequency and differential pressure.
 - (2) Documentation of all corrective actions implemented, per event .
 - (3) Operation and preventive maintenance logs, including work purchases orders, shall be maintained.
 - (4) Quality Assurance/Quality Control (QA/QC) procedures.
 - (5) Operator standard operating procedures (SOP).
 - (6) Manufacturer's specifications or its equivalent.
 - (7) Equipment "troubleshooting" contingency plan.

**INDIANA DEPARTMENT OF ENVIRONMENTAL MANAGEMENT
OFFICE OF AIR MANAGEMENT
COMPLIANCE DATA SECTION
and
VIGO COUNTY AIR POLLUTION CONTROL

PART 70 OPERATING PERMIT
CERTIFICATION**

Source Name: Schering-Plough Animal Health Corporation
Source Address: 1331 South First Street, Terre Haute, Indiana, 47802
Mailing Address: 1331 South First Street, Terre Haute, Indiana, 47802
Part 70 Permit No.: T167-7544-00004

**This certification shall be included when submitting monitoring, testing reports/results
or other documents as required by this permit.**

Please check what document is being certified:

- ☒ Annual Compliance Certification Letter
- ☐ Test Result (specify) _____
- ☐ Report (specify) _____
- ☐ Notification (specify) _____
- ☐ Other (specify) _____

I certify that, based on information and belief formed after reasonable inquiry, the statements and information in the document are true, accurate, and complete.

Signature:

Printed Name:

Title/Position:

Date:

**INDIANA DEPARTMENT OF ENVIRONMENTAL MANAGEMENT
OFFICE OF AIR MANAGEMENT
COMPLIANCE DATA SECTION
P.O. Box 6015
100 North Senate Avenue
Indianapolis, Indiana 46206-6015
Phone: 317-233-5674
Fax: 317-233-6865**

and

VIGO COUNTY AIR POLLUTION CONTROL

**PART 70 OPERATING PERMIT
EMERGENCY/DEVIATION OCCURRENCE REPORT**

Source Name: Schering-Plough Animal Health Corporation
Source Address: 1331 South First Street, Terre Haute, Indiana, 47802
Mailing Address: 1331 South First Street, Terre Haute, Indiana, 47802
Part 70 Permit No.: T167-7544-00004

This form consists of 2 pages

Page 1 of 2

Check either No. 1 or No.2	
9 1.	This is an emergency as defined in 326 IAC 2-7-1(12)
C	The Permittee must notify the Office of Air Management (OAM), within four (4) business hours (1-800-451-6027 or 317-233-5674, ask for Compliance Section); and
C	The Permittee must submit notice in writing or by facsimile within two (2) days (Facsimile Number: 317-233-5967), and follow the other requirements of 326 IAC 2-7-16
9 2.	This is a deviation, reportable per 326 IAC 2-7-5(3)(c)
C	The Permittee must submit notice in writing within ten (10) calendar days

If any of the following are not applicable, mark N/A

Facility/Equipment/Operation:
Control Equipment:
Permit Condition or Operation Limitation in Permit:
Description of the Emergency/Deviation:
Describe the cause of the Emergency/Deviation:

If any of the following are not applicable, mark N/A

Page 2 of 2

Date/Time Emergency/Deviation started:
Date/Time Emergency/Deviation was corrected:
Was the facility being properly operated at the time of the emergency/deviation? Y N Describe:
Type of Pollutants Emitted: TSP, PM-10, SO ₂ , VOC, NO _x , CO, Pb, other:
Estimated amount of pollutant(s) emitted during emergency/deviation:
Describe the steps taken to mitigate the problem:
Describe the corrective actions/response steps taken:
Describe the measures taken to minimize emissions:
If applicable, describe the reasons why continued operation of the facilities are necessary to prevent imminent injury to persons, severe damage to equipment, substantial loss of capital investment, or loss of product or raw materials of substantial economic value:

Form Completed by: _____
Title / Position: _____
Date: _____
Phone: _____

**INDIANA DEPARTMENT OF ENVIRONMENTAL MANAGEMENT
OFFICE OF AIR MANAGEMENT
COMPLIANCE DATA SECTION
and
VIGO COUNTY AIR POLLUTION CONTROL**

**PART 70 OPERATING PERMIT
NATURAL GAS FIRED BOILER CERTIFICATION**

Source Name: Schering-Plough Animal Health Corporation
Source Address: 1331 South First Street, Terre Haute, Indiana, 47802
Mailing Address: 1331 South First Street, Terre Haute, Indiana, 47802
Part 70 Permit No.: T167-7544-00004

**This certification shall be included when submitting monitoring, testing reports/results
or other documents as required by this permit.**

Report period

Beginning: _____

Ending: _____

Boiler Affected

Alternate Fuel

Days burning alternate fuel

From

To

I certify that, based on information and belief formed after reasonable inquiry, the statements and information in the document are true, accurate, and complete.

Signature: _____

Printed Name: _____

Title/Position: _____

Date: _____

**INDIANA DEPARTMENT OF ENVIRONMENTAL MANAGEMENT
OFFICE OF AIR MANAGEMENT
COMPLIANCE DATA SECTION
and
VIGO COUNTY AIR POLLUTION CONTROL**

Part 70 Quarterly Report

Source Name: Schering-Plough Animal Health Corporation
Source Address: 1331 South First Street, Terre Haute, Indiana, 47802
Mailing Address: 1331 South First Street, Terre Haute, Indiana, 47802
Part 70 Permit No.: T167-7544-00004
Facility: (2) Boilers
Limit: 1,115,493 gallons per year based on 0.5 percent sulfur content.

YEAR: _____

Month	Column 1	Column 2	Column 1 + Column 2	Average Sulfur Content
	This Month (gallons of fuel oil)	Previous 11 Months (gallons of fuel oil)	12 Month Total (gallons of fuel oil)	
Month 1				
Month 2				
Month 3				

9 No deviation occurred in this quarter.

9 Deviation/s occurred in this quarter.

Deviation has been reported on: _____

Submitted by: _____
Title / Position: _____
Signature: _____
Date: _____
Phone: _____

**INDIANA DEPARTMENT OF ENVIRONMENTAL MANAGEMENT
OFFICE OF AIR MANAGEMENT
COMPLIANCE DATA SECTION
and
VIGO COUNTY AIR POLLUTION CONTROL**

**PART 70 OPERATING PERMIT
QUARTERLY COMPLIANCE MONITORING REPORT**

Source Name: Schering-Plough Animal Health Corporation
Source Address: 1331 South First Street, Terre Haute, Indiana 47802
Mailing Address: 1331 South First Street, Terre Haute, Indiana 47802
Part 70 Permit No.: T167-7544-00004

Months: _____ **to** _____ **Year:** _____

This report is an affirmation that the source has met all the compliance monitoring requirements stated in this permit. This report shall be submitted quarterly. Any deviation from the compliance monitoring requirements and the date(s) of each deviation must be reported. Additional pages may be attached if necessary. This form can be supplemented by attaching the Emergency/Deviation Occurrence Report. If no deviations occurred, please specify in the box marked "No deviations occurred this reporting period".

9 NO DEVIATIONS OCCURRED THIS REPORTING PERIOD

9 THE FOLLOWING DEVIATIONS OCCURRED THIS REPORTING PERIOD.

Compliance Monitoring Requirement (e.g. Permit Condition D.1.3)	Number of Deviations	Date of each Deviation

Form Completed By: _____
Title/Position: _____
Date: _____
Phone: _____

**Indiana Department of Environmental Management
Office of Air Management
and
Vigo County Air Pollution Control**

**Technical Support Document (TSD) for a Part 70 Operating Permit
and
Enhanced New Source Review (ENSR)**

Source Background and Description

Source Name: Schering-Plough Animal Health Corporation
Source Location: 1331 South First Street
County: Vigo
SIC Code: 2834, 2048
Operation Permit No.: T167-7544-00004
Permit Reviewer: Darren Woodward

Vigo County Air Pollution Control (VCAPC) has reviewed a Part 70 permit application from Schering-Plough Corporation relating to the operation of a stationary animal pharmaceutical production facility.

Permitted Emission Units and Pollution Control Equipment

The source consists of the following permitted emission units and pollution control devices:

- (1) Two (2) natural gas fired boilers with #2 fuel oil as backup fuel, identified as, B-101 and B-102, respectively, with a maximum capacity of 16.6 million (MM) British thermal unit (Btu) per hour heat input each, and exhausting at two (2) stacks (STK-B1 and STK-B2).
- (2) A Clinacox pharmaceutical premix feed blending/bagging facility capable of producing six (6) 5,000 pound batches per day, exhausting at three (3) stacks (STK-C1, STK-C2, and STK-C3). The facility will include the following dust collectors:
 - a) Receiving Silo Dust Collector, DC-101 (also referred to as BH-10)
 - b) Process Silo Dust Collector, DC-102 (also referred to as BH-11)
 - c) Ribbon Blender Dust Collector, DC-201 (also referred to as BH-12)
 - d) Product Bagging Dust Collector, DC-301 (also referred to as BH-13)
 - e) Weighing & Mixing Dust Collector, DC-401 (also referred to as BH-14)
- (3) One (1) salt solution storage tank with a 1,000 cubic foot capacity and a wet scrubber for dust control, exhausting at one (1) stack (STK-S1).

Unpermitted Emission Units and Pollution Control Equipment also being reviewed under ENSR

The source also consists of the following unpermitted facility:

- (4) A Zeranol pharmaceutical producing operation used for the production of Ralgro®, a cattle growth promotant. This facility has maximum potential capacity of 132 batches per year. The process contains two (2) dust collectors (DC-202, and DC-203) with the emissions exhausting at hypothetical stack STK-Z1.

The Zeranol production process involves the use of numerous pieces of equipment, several of which are reused throughout the various stages of production. Emission units in this process include both point sources (process tanks, dryers, etc.) and fugitive sources (vacuum pumps, filters, etc.). These emissions are exhausted from the building through a number of routes such as point stacks, building ventilation, windows, bay doors, etc.

Emission Units and Pollution Control Equipment Under Enhanced New Source Review (ENSR)

There are no new facilities to be reviewed under the ENSR process.

Insignificant Activities

The source also consists of the following insignificant activities, as defined in 326 IAC 2-7-1(20):

- (1) Storage tanks with capacity less than or equal to 1,000 gallons and annual throughput less than 12,000 gallons.
- (2) Vessels storing lubricating oils, hydraulic oils, machining oils, and machining fluids.
- (3) Degreasing operations that do not exceed 145 gallons per 12 months, except if subject to 326 IAC 20-6.
- (4) Cleaners and solvents characterized as follows:
 - A) having a vapor pressure equal to or less than 2 kPa; 15mm Hg; or 0.3 psi measured at 38 degrees C (100EF) or;
 - B) having a vapor pressure equal to or less than 0.7 kPa; 5mm Hg; or 0.1 psi measured at 20EC (68EF); the use of which for all cleaners and solvents combined does not exceed 145 gallons per 12 months.
- (5) The following equipment related to manufacturing activities not resulting in the emission of HAPs: brazing equipment, cutting torches, soldering equipment, welding equipment.
- (6) Solvent recycling systems with batch capacity less than or equal to 100 gallons.
- (7) Activities associated with the treatment of wastewater streams with an oil and grease content less than or equal to 1% by volume.
- (8) Any operation using aqueous solutions containing less than 1% by weight of VOCs excluding HAPs.
- (9) Replacement or repair of electrostatic precipitators, bags in baghouses and filters in other air filtration equipment.
- (10) Process vessel degassing and cleaning to prepare for internal repairs.
- (11) Stockpiled soils from soil remediation activities that are covered and waiting transport for disposal.
- (12) Paved and unpaved roads and parking lots with public access.
- (13) Asbestos abatement projects regulated by 326 IAC 14-10.
- (14) Equipment used to collect any material that might be released during a malfunction, process upset, or spill cleanup, including catch tanks, temporary liquid separators, tanks, and fluid handling equipment.

- (15) Blowdown for any of the following: sight glass; boiler; compressors; pumps; and cooling tower.
- (16) On-site fire and emergency response training approved by the department.
- (17) Stationary fire pumps.
- (18) A laboratory as defined in 326 IAC 2-7-1(20)(c).
- (19) Other activities or categories not previously identified:
 - Current process wastewater pretreatment system
 - In-Construction process wastewater pretreatment system
 - Fuel oil storage tank (25,000-gallon AST)
 - Methanol storage tank V-201A (3,700-gallon AST)
 - Methanol storage tank V-201B (3,700-gallon AST)
 - Methanol storage tank V-201C (3,700-gallon AST)
 - Methanol storage tank V-201D (3,700-gallon AST)
 - Tertiary butyl alcohol storage tank V-202A (3,700-gallon AST)
 - Tertiary butyl alcohol storage tank V-202B (3,700-gallon AST)
 - Recovered methanol storage tank V-203A (3,700-gallon AST)
 - Recovered methanol storage tank V-203B (3,700-gallon AST)
 - Unpaved roads (not public access)
 - Portable water pump
 - 5-gallon reactor for pilot scale R&D Zeranol studies
 - Ralgro Pelletizing
 - Ralgro Packaging
 - 0.95 MM Btu/hr standby generator
 - Outfall Pond#1
 - Outfall Pond#2
 - Sprayfield Holding Pond
 - P-1492 Production - Fermentation Area
 - P-1492 Production - Dryer Room
 - PST (discontinued)

Existing Approvals

The source has been operating under the following approvals:

- (1) CP 167-3685, issued on November 14, 1994,
- (2) CP 167-1916, issued on September 25, 1991,
- (3) 04-2834-01-95, issued on January 13, 1995, and
- (4) CP 167-V017, issued on January 30, 1997.

Enforcement Issue

- (a) IDEM is aware that the following equipment has been constructed and operated prior to receipt of the proper permit:
 - (1) A Zeranol pharmaceutical producing operation used for the production of Ralgro®, a cattle growth promotant. This facility has maximum potential capacity of 132 batches per year. The process contains two (2) dust collectors (DC-202, and DC-203) with the emissions exhausting at hypothetical stack STK-Z1.

- (b) IDEM is reviewing this matter and will take appropriate action. This proposed permit is intended to satisfy the requirements of the construction permit rules.

Recommendation

The staff recommends to the Commissioner that the Part 70 permit be approved. This recommendation is based on the following facts and conditions:

Unless otherwise stated, information used in this review was derived from the application and additional information submitted by the applicant.

An administratively complete Part 70 permit application for the purposes of this review was received on December 13, 1996.

A notice of Administrative completeness has been mailed to the source on January 10, 1997.

Emission Calculations

See Appendix A of this document for detailed emissions calculations.

Potential Emissions

Pursuant to 326 IAC 1-2-55, Potential Emissions are defined as "emissions of any one (1) pollutant which would be emitted from a facility, if that facility were operated without the use of pollution control equipment unless such control equipment is necessary for the facility to produce its normal product or is integral to the normal operation of the facility."

Pollutant	Potential Emissions (tons/year)
PM	39.6
PM-10	39.6
SO ₂	39.6
VOC	78.9
CO	5.09
NO _x	20.4

Note: For the purpose of determining Title V applicability for particulates, PM-10, not PM, is the regulated pollutant in consideration.

Note: For the combustion sources, the potential emissions was determined by comparing the worst case scenario between the natural gas and the limited amount of Fuel Oil usage. The limit was established in a previous permit.

HAP's	Potential Emissions (tons/year)
Methanol	68.1
TOTAL	68.1

- (a) The potential emissions (as defined in Indiana Rule) of any single HAP is equal to or greater than ten (10) tons per year. Therefore, the source is subject to the provisions of 326 IAC 2-7.

Actual Emissions

The following table shows the actual emissions from the source.

Pollutant	Actual Emissions (tons/year)
PM	16.8
PM-10	16.8
SO ₂	0.091
VOC	39.5
CO	1.16
HAP (Methanol)	34.1
NO _x	4.64

Limited Potential to Emit

The table below summarizes the total limited potential to emit of the significant emission units.

Process/ facility	Limited Potential to Emit (tons/year)						
	PM	PM-10	SO ₂	VOC	CO	NO _x	HAPs
Clinacox	* 14.9	14.9					
2 Boilers (Fuel Oil usage limit)	1.12	1.12	** 39.6	0.112	2.79	11.2	
Total Emissions	16.02	16.02	39.6	0.112	2.79	11.2	

* As determined in CP 167-1916, the particulate matter emissions from the Clinacox blending/bagging facility shall be limited to 3.4 pounds per hour (14.9 tons/yr). This will satisfy the requirements of 326 IAC 6-3-2.

** As determined in CP 167-3685, the amount of fuel oil No.2 combusted in the two boilers and one generator shall be limited to 1,115,493 gallons per year, based on 0.5 percent sulfur content. This will make the Emission Offset rules, 326 IAC 2-3, and 40 CFR 51.18(j) not applicable. This fuel limit was based on the status of Vigo County as nonattainment for SO₂, when the two (2) boilers were originally permitted.

County Attainment Status

The source is located in Vigo County.

Pollutant	Status
TSP	attainment
PM-10	attainment
SO ₂	maintenance nonattainment
NO ₂	attainment
Ozone	attainment
CO	attainment
Lead	attainment

- (a) Volatile organic compounds (VOC) and oxides of nitrogen are precursors for the formation of ozone. Therefore, VOC and NO_x emissions are considered when evaluating the rule applicability relating to the ozone standards. Vigo County has been designated as attainment or unclassifiable for ozone.

Part 70 Permit Conditions

This source is subject to the requirements of 326 IAC 2-7, pursuant to which the source has to meet the following:

- (1) Emission limitations and standards, including those operational requirements and limitations that assure compliance with all applicable requirements at the time of issuance of Part 70 permits.

- (2) Monitoring and related record keeping requirements which assume that all reasonable information is provided to evaluate continuous compliance with the applicable requirements.

Federal Rule Applicability

- The two (2) 16.6 million (MM) British thermal units (Btu) per hour #2 fuel oil and natural gas fired boilers (B-101 and B-102) are subject to the New Source Performance Standard, 326 IAC 12, (40 CFR 60.42c(d), Subpart Dc). (a) Pursuant to 40 CFR 60.42(d), Subpart Dc, on or after the date on which the initial performance test is completed or required to be completed under 40 CFR 60.8, whichever date comes first, no owner or operator of the boilers shall cause to be discharged into the atmosphere from the boilers any gases that contain SO₂ in excess of 0.50 lb/million Btu heat input; or, as an alternative, no owner or operator of boilers shall combust distillate oil that contains greater than 0.5 weight percent sulfur.
- (b) Pursuant to 40 CFR 60.42c(h), compliance with the emission limits or fuel oil sulfur limits may be determined based on a certification from the fuel supplier. Fuel supplier certification shall include the following information for distillate oil:
 - (i) The name of the oil supplier; and
 - (ii) A statement from the oil supplier that the oil complies with the specifications under the definition of distillate oil in 40 CFR 60.41c.
 - (c) Pursuant to 40 CFR 60.42c(h)(i), the SO₂ emission limits and fuel oil sulfur limits apply at all times, including period of startup, shutdown, and malfunction.
 - (d) Schering-Plough Animal Health Corporation is not subject to the National Emission Standards for Hazardous Air Pollutants, 326 IAC 20-6, (40 CFR 63, Subpart T), because Schering-Plough Animal Health Corporation utilizes water-based solvents in their degreasing operations.
 - (d) The Zeranol facility is subject to the National Emission Standards for Hazardous Air Pollutants (NESHAP) MACT standard for Pharmaceuticals production, which will be finalized by November 15, 1997 and at that time will be incorporated into this permit.

State Rule Applicability - Entire Source

326 IAC 2-2 (Prevention of Significant Deterioration (PSD) Requirements)

This source is not subject to 326 IAC 2-2 (PSD Requirements), because the stationary source potential emissions are less than 250 tons per year.

326 IAC 2-6 (Emission Reporting)

This source is subject to 326 IAC 2-6 (Emission Reporting), because it has the potential to emit more than ten (10) tons per year of a single HAP. Pursuant to this rule, the owner/operator of the source must annually submit an emission statement for the source. The annual statement must be received by July 1 of each year and contain the minimum requirement as specified in 326 IAC 2-6-4. The submittal should cover the period defined in 326 IAC 2-6-2(8) (Emission Statement Operating Year).

326 IAC 5-1 (Visible Emissions Limitations)

Pursuant to 326 IAC 5-1-2 (Visible Emissions Limitations), except as provided in 326 IAC 5-1-3 (Temporary Exemptions), visible emissions shall meet the following, unless otherwise stated in this permit:

- (a) Visible emissions shall not exceed an average of forty percent (40%) opacity in twenty-four (24) consecutive readings as determined by 326 IAC 5-1-4,
- (b) Visible emissions shall not exceed sixty percent (60%) opacity for more than a cumulative total of fifteen (15) minutes (sixty (60) readings) in a six (6) hour period.

326 IAC 8-3-2 (Cold cleaner operation)

Pursuant to 326 IAC 8-3-2 (Cold cleaner operation), the owner or operator of a cold cleaning facility shall:

- (1) equip the cleaner with a cover;
- (2) equip the cleaner with a facility for draining cleaned parts;
- (3) close the degreaser cover whenever parts are not being handled in the cleaner;
- (4) drain cleaned parts for at least fifteen (15) seconds or until dripping ceases;
- (5) provide a permanent, conspicuous label summarizing the operating requirements;
- (6) store waste solvent only in covered containers and not dispose of waste solvent or transfer it to another party, in such a manner that greater than twenty percent (20%) of the waste solvent (by weight) can evaporate into the atmosphere.

State Rule Applicability - Individual Facilities

326 IAC 2-3 (Emission Offset)

Pursuant to CP 167-3685, issued on November 14, 1994, the amount of No.2 fuel oil combusted in two (2) boilers and one (1) generator shall be limited to 1,115,493 gallons per year, based on 0.5 percent sulfur content. Therefore, 326 IAC 2-3 and 40 CFR 51.18(j) will not apply to this facility. This fuel limit was based on the status of Vigo County as nonattainment for SO₂, when the two (2) boilers and generator were originally permitted.

326 IAC 7-1.1-2 (Sulfur dioxide emission limitations)

Pursuant to 326 IAC 7-1.1-2 (Sulfur dioxide emission limitations), sulfur dioxide emissions from fuel combustion facilities shall be limited as follows, unless specified otherwise in 326 IAC 7-4 or in a construction permit issued pursuant to 326 IAC 2: five-tenths (0.5) pounds per million Btu for distillate oil combustion.

326 IAC 6-2-4 (Emission limitations for facilities specified in 326 IAC 6-2-1(c))

Pursuant to 326 IAC 6-2-4 (Emission limitations for facilities specified in 326 IAC 6-2-1(c)), particulate emissions from indirect heating facilities constructed after September 21, 1983 shall be limited by the following equation: $Pt = 1.09/Q^{0.26}$, where Pt = pounds of particulate matter emitted per million Btu (lb/mmBtu) heat input. Q = total source maximum operating capacity rating in million Btu per hour (mmBtu/hr) heat input.

326 IAC 6-3-2 (Process Operations)

Pursuant to CP 167-1916-00009, issued on September 25, 1991, the particulate matter (PM) emissions from the the Clinacox blending/bagging facility shall be limited to 14.9 tons per year (3.4 lbs/hr). This will satisfy the requirements of 326 IAC 6-3.

326 IAC 6-3-2 (Process Operations)

Pursuant to CP 167-V017, issued on January 29, 1997, the allowable particulate matter (PM) emissions from the salt storage system shall not be in excess of 30.5 pounds per hour (134 tons/yr). The emission rate of 0.854 pounds per hour (3.75 tons/yr) from the salt storage system is in compliance with 326 IAC 6-3-2.

326 IAC 6-3-2 (Process Operations)

Pursuant to 326 IAC 6-3-2 (Process Operations), the particulate matter (PM) emissions from the Zeranol facility shall be limited to 40.2 tons per year (9.2 lbs/hr). This will satisfy the requirements of 326 IAC 6-3.

326 IAC 8-5-3 (Synthesized pharmaceutical manufacturing operations)

Since the Zeranol process is an operation used for the production of Ralgro® by means of fermentation, not chemical synthesis, 326 IAC 8-5-3 does not apply.

Compliance Requirements

Permits issued under 326 IAC 2-7 are required to ensure that sources can demonstrate compliance with applicable state and federal rules on a more or less continuous basis. All state and federal rules contain compliance provisions, however, these provisions do not always fulfill the requirement for a more or less continuous demonstration.

When this occurs IDEM, OAM, in conjunction with the source, must develop specific conditions to satisfy 326 IAC 2-7-5. As a result, compliance requirements are divided into two sections: Compliance Determination Requirements and Compliance Monitoring Requirements.

Compliance Determination Requirements in permit Section D are those conditions that are found more or less directly within state and federal rules and the violation of which serves as grounds for enforcement action. If these conditions are not sufficient to demonstrate continuous compliance, they will be supplemented with Compliance Monitoring Requirements, also in permit Section D. Unlike Compliance Determination Requirements, failure to meet Compliance Monitoring conditions would serve as a trigger for corrective actions and not grounds for enforcement action. However, a violation in relation to a compliance monitoring condition will arise through a source's failure to take the appropriate corrective actions within a specific time period.

- (a) Daily visible emissions notations of the boilers stack shall be performed during normal daylight operations. A trained employee will record whether emissions are normal or abnormal. For processes operated continuously "normal" means those conditions prevailing, or expected to prevail, eighty percent (80%) of the time the process is in operation, not counting startup or shut down time. In the case of batch or discontinuous operations, readings shall be taken during that part of the operation that would normally be expected to cause the greatest emissions. A trained employee is an employee who has worked at the plant at least one (1) month and has been trained in the appearance and characteristics of normal visible emissions for that specific process. The Preventive Maintenance Plan for this unit shall contain troubleshooting contingency and corrective actions for when an abnormal emission is observed.
- (b) The Permittee shall record if the opacity appears to be normal or above normal once each operating day.
- (c) The Permittee shall obtain No.2 fuel oil sulfur content certification from the fuel oil supplier on each fuel oil delivery date. The Permittee shall maintain the records at the facility for five (5) years.
- (d) The Permittee shall record the actual fuel usage and hours of operation, for the two (2) boilers, once each operating day. Sulfur dioxide and particulate matter emission calculations shall be performed quarterly.
- (e) Daily visible emissions notations of the Clinacox exhaust stacks (STK-C1, STK-C2, STK-C3) shall be performed during normal daylight operations. A trained employee will record whether emissions are normal or abnormal. For processes operated continuously "normal" means those conditions prevailing, or expected to prevail, eighty percent (80%) of the time the process is in operation, not counting startup or shut down time. In the case of batch or discontinuous operations, readings shall be taken during that part of the operation that would normally be expected to cause the greatest emissions. A trained employee is an employee who has worked at the plant at least one (1) month and has been trained in the appearance and characteristics of normal visible emissions for that specific process.
- (f) The Permittee shall record the following data: total static pressure drop across the five (5) dust collectors (DC-101, DC-102, DC-201, DC-301, and DC-401) controlling the Clinacox process, at least once daily when the Clinacox process is in operation; the Permittee shall record if the opacity appears to be normal or above normal once each operating day; records of corrective actions at the time the corrective action takes place; and quarterly emission calculations performed for particulate matter. Unless operated under conditions for which the Preventive Maintenance Plan specifies otherwise, the pressure drop across the dust collectors shall be maintained within the range of **3.0 to 6.0** inches of water or a range established during the latest stack test.

Every six months operating and maintenance procedures will be performed on the dust collectors as specified in the Preventative Maintenance Plan.

- (e) Daily visible emissions notations of the Zeranol exhaust stack (STK-Z1) shall be performed during normal daylight operations. A trained employee will record whether emissions are normal or abnormal. For processes operated continuously "normal" means those conditions prevailing, or expected to prevail, eighty percent (80%) of the time the process is in operation, not counting startup or shut down time. In the case of batch or discontinuous operations, readings shall be taken during that part of the operation that would normally be expected to cause the greatest emissions. A trained employee is an employee who has worked at the plant at least one (1) month and has been trained in the appearance and characteristics of normal visible emissions for that specific process.
- (f) The Permittee shall record the following data: total static pressure drop across both dust collectors (DC-202, and DC-203) controlling the Zeranol process, at least once daily when the Zeranol process is in operation; the Permittee shall record if the opacity appears to be normal or above normal once each operating day; records of corrective actions and preventative maintenance actions at the time the action's take place; and quarterly emission calculations performed for particulate matter. Unless operated under conditions for which the Preventive Maintenance Plan specifies otherwise, the pressure drop across the dust collectors shall be maintained within the range of **3.0 to 6.0** inches of water or a range established during the latest stack test. Every six months operating and maintenance procedures will be performed on the dust collectors as specified in the Preventative Maintenance Plan.
- (g) Visible emissions notations of the Salt Storage System exhaust stack (STK-S1) for the two (2) wet scrubbers (DC-701A, and DC-701B) shall be performed once per truck unloading. A trained employee will record whether emissions are normal or abnormal. For processes operated continuously "normal" means those conditions prevailing, or expected to prevail, eighty percent (80%) of the time the process is in operation. A trained employee is an employee who has worked at the plant at least one (1) month and has been trained in the appearance and characteristics of normal visible emissions for that specific process.
- (h) The Permittee shall record the following data: the Permittee shall record if the opacity appears to be normal or above normal once per truck unloading; corrective actions and preventive maintenance actions at the time the action's take place; and quarterly emission calculations performed for particulate matter. Every six months operating and maintenance procedures will be performed on the dust collectors as specified in the Preventative Maintenance Plan.

Air Toxic Emissions

Indiana presently requests applicants to provide information on emissions of the 187 hazardous air pollutants set out in the Clean Air Act Amendments of 1990. These pollutants are either carcinogenic or otherwise considered toxic and are commonly used by industries. They are listed as air toxics on the Office of Air Management (OAM) Part 70 Application Form GSD-08.

- (a) This source will emit levels of air toxics greater than those that constitute major source applicability according to Section 112 of the Clean Air Act.
- (b) Since this source is not a new source (effective date: July 27, 1997), 326 IAC 2-1-3.4 does not apply.

Conclusion

The operation of this animal pharmaceutical production facility shall be subject to the conditions of the attached proposed **Part 70 Permit No. T167-7544-00004**.

Description of facility: Two (2) Combustion Sources
Max Rating: 16.6 million (MM) British thermal units per hour each
Construction Date: Each boiler was constructed in November 14, 1994
Control Device (if any): N/A
Stack/Vent ID: STK-B1 and STK-B2

Description: Two (2) natural gas boilers with #2 fuel oil as a backup fuel

EMISSION LIMITATIONS			
Numerical Emission Limit:	0.5 lb/MMBtu heat input of SO ₂ per each boiler. Sulfur content of the fuel oil shall not exceed 0.5% by weight.	Particulate emissions shall be limited by: Pt=1.09/Q ^{0.26}	No.2 fuel oil combusted in the two (2) boilers and one (1) generator shall not exceed 1,115,493 gallons per year (CP 167-3685).
Regulation/Citation:	326 IAC 7-1.1-1	326 IAC 6-2-4	326 IAC 2-3
Compliance Demonstration:	Demonstrate compliance using one (1) of the options pursuant to 40 CFR 60, Subpart Dc.	NA	NA
PERFORMANCE TESTING			
Parameter/Pollutant to be Tested:	NA	NA	NA
COMPLIANCE MONITORING			
Monitoring Description:	Vendor analysis of the fuel (certification) or analysis of the oil sample to determine sulfur content and visible emission notation.	NA	NA
Monitoring Method:	Daily visible emission notations	NA	NA
Monitoring Regulation/Citation:	326 IAC 2-7-5(3), 326 IAC 3-3-4	NA	NA
Monitoring Frequency:	Daily visible emission notations	NA	NA
RECORD KEEPING			
Parameter/Pollutant to be Recorded:	Sulfur Dioxide	NA	NA
Recording Frequency:	Calendar dates covered in the compliance determination period	NA	NA
REPORTING REQUIREMENTS			
Information in Report:	NA	NA	Gallons of No.2 this month, gallons of No.2 previous 11 months, gallons of No.2 on 12 month total, and average sulfur content per each month
Reporting Frequency/Submittal:	NA	NA	Submitted within thirty (30) days after the end of the quarter being reported
Additional Comments:	Preventative maintenance plan	NA	NA

Description of facility: Clinacox pharmaceutical premix feed blending/bagging facility.
Construction Date: September 25, 1991
Control Device (if any): Each is controlled by a fabric filter dust collector
Stack/Vent ID: STK-C1, STK-C2, and STK-C3

Description: five (5) Dust Collectors

EMISSION LIMITATIONS			
Numerical Emission Limit:	Particulate emissions shall be limited by CP 167-1916 to 14.9 tons per year.	NA	NA
Regulation/Citation:	326 IAC 6-3	NA	NA
Compliance Demonstration:	NA	NA	NA
PERFORMANCE TESTING			
Parameter/Pollutant to be Tested:	NA	NA	NA
COMPLIANCE MONITORING			
Monitoring Description:	Visible Emission Notations	Parametric Monitoring	Broken Bag or Failure Detection
Monitoring Method:	Daily Visible Emission Notations	The instrument used to determine the pressure drop shall comply with Section C- Pressure Gauge Specifications.	Daily visible notation
Monitoring Regulation/Citation:	326 IAC 2-7-5(3)	326 IAC 2-7-5(3)	326 IAC 2-7-5(3)
Monitoring Frequency:	Daily visible emission notations	Minimum - once weekly	Daily visible notation
RECORD KEEPING			
Parameter/Pollutant to be Recorded:	Particulate Matter	Pressure drop across baghouses	baghouse bags
Recording Frequency:	Daily records	weekly records	daily records
REPORTING REQUIREMENTS			
Information in Report:	Summary of the information to document compliance with Condition D.2.4 - D.2.6.	Summary of the information to document compliance with Condition D.2.4 - D.2.6.	Summary of the information to document compliance with Condition D.2.4 - D.2.6.
Reporting Frequency/Submittal:	Upon Request	Upon Request	Upon Request
Additional Comments:	Preventive Maintenance Plan required	Preventive Maintenance Plan required	NA

Description of facility: Zeranol batch pharmaceutical operation used for the production of Ralgro®.
Construction Date: 1950
Control Device (if any): Two (2) dust collectors (DC-202 and DC-203)
Stack/Vent ID: Hypothetical stack (STK-Z1)

EMISSION LIMITATIONS			
Numerical Emission Limit:	NA	NA	NA
Regulation/Citation:	NA	NA	NA
Compliance Demonstration:	NA	NA	NA
PERFORMANCE TESTING			
Parameter/Pollutant to be Tested:	NA	NA	NA
COMPLIANCE MONITORING			
Monitoring Description:	Visible Emission Notations	Parametric Monitoring	Broken Bag or Failure Detection
Monitoring Method:	Daily Visible Emission Notations	The instrument used to determine the pressure drop shall comply with Section C-Pressure Gauge Specifications.	Daily visible notation
Monitoring Regulation/Citation:	326 IAC 2-7-5(3)	326 IAC 2-7-5(3)	326 IAC 2-7-5(3)
Monitoring Frequency:	Daily visible emission notations	Minimum - once weekly	Daily visible notation
RECORD KEEPING			
Parameter/Pollutant to be Recorded:	Particulate Matter	Pressure drop across baghouses	baghouse bags
Recording Frequency:	Daily records	weekly records	daily records
REPORTING REQUIREMENTS			
Information in Report:	Summary of the information to document compliance with Condition D.3.3 - D.3.5.	Summary of the information to document compliance with Condition D.3.3 - D.3.5.	Summary of the information to document compliance with Condition D.3.3 - D.3.5.
Reporting Frequency/Submittal:	Upon Request	Upon Request	Upon Request
Additional Comments:	Preventive Maintenance Plan required	Preventive Maintenance Plan required	NA

Description of facility: Salt Storage System
Construction Date: 1996
Control Device (if any): Two (2) wet scrubber (DC-701A and DC-701B) rated at 99% efficient
Stack/Vent ID: STK-S1

EMISSION LIMITATIONS	
Numerical Emission Limit:	30.5 lb./hr
Regulation/Citation:	326 IAC 6-3
Compliance Demonstration:	NA
PERFORMANCE TESTING	
Parameter/Pollutant to be Tested:	NA
COMPLIANCE MONITORING	
Monitoring Description:	Visible Emission Notations
Monitoring Method:	Daily Visible Emission Notations
Monitoring Regulation/Citation:	326 IAC 2-7-5(3)
Monitoring Frequency:	Daily visible emission notations
RECORD KEEPING	
Parameter/Pollutant to be Recorded:	Particulate Matter
Recording Frequency:	Daily records
REPORTING REQUIREMENTS	
Information in Report:	Summary of the information to document compliance with Condition D.4.1 and D.4.4.
Reporting Frequency/Submittal:	Upon Request
Additional Comments:	Preventive Maintenance Plan required

**Indiana Department of Environmental Management
Office of Air Management
and
Vigo County Air Pollution Control**

Addendum to the
Technical Support Document for a Part 70 Permit (Title V)

Source Name: Schering-Plough Animal Health Corporation
Source Location: 1331 South First Street
County: Vigo
Part 70 Permit No.: T167-7544-00004
SIC Code: 2834, 2048
Permit Reviewer: Darren Woodward

On November 25, 1997, Vigo County Air Pollution Control (VCAPC) had a notice published in the Tribune Star, Terre Haute, Indiana, stating that Schering-Plough Animal Health Corporation had applied for a Part 70 Permit to operate a stationary animal pharmaceutical production facility. The notice also stated that VCAPC proposed to issue a Part 70 Permit for this operation and provided information on how the public could review the proposed permit and other documentation. Finally, the notice informed interested parties that there was a period of thirty (30) days to provide comments on whether or not this Part 70 Permit should be issued as proposed.

On December 19, 1997, Schering-Plough Animal Health Corporation submitted comments on the proposed permit. The summary of the comments is as follows:

1. Comment
 - (a) Concerning A.3, Item 19 - The in-construction process wastewater pretreatment system was completed in July, 1997.
 - (b) Concerning A.3, Item 19 - Outfall pond #2 has been abandoned and is no longer in use as an NPDES outfall. This pond will be eliminated from the NPDES permit when the April, 1995 permit renewal is processed.
 - (c) Concerning A.3, Item 19 - The sprayfield holding pond was not included in the transfer of assets to Schering-Plough Animal Health Corporation. The sprayfield and the holding pond remain the property of Mallinckrodt Veterinary, Inc., and is being administered by Mallinckrodt Inc.
 - (d) Concerning A.3, Item 19 - The PST facility was not included in the transfer of assets to Schering-Plough Animal Health Corporation. The PST facility remains the property of Mallinckrodt Veterinary, Inc., and is being administered by Mallinckrodt Inc.

Response

- (a) No change
- (b) The Outfall pond #2 will be removed from the permit.
- (c) The sprayfield holding pond is not part of the operation and was not included in the transfer of assets, therefore, the sprayfield holding pond shall be removed from this permit.
- (d) The PST facility is not part of the operation and was not included in the transfer of assets, therefore, the PST facility shall be removed from this permit.

2. Comment

Concerning B.11, Item (b) - In the fourth line, the word "othre" should be spelled "other".

Response

The typographical error will be corrected.

3. Comment

Concerning C.10 - Schering-Plough Animal Health Corporation should be able to complete the replacement of differential pressure gauges and modification of the salt storage tank exhaust stack in less than 90 days.

Response

The Permittee is responsible for installing any necessary equipment and initiating any required monitoring related to that equipment, no more than ninety (90) days after receipt of the permit. The fact that the source will complete this replacement sooner than the 90 day limit is sufficient, but no need for a change in the language.

4. Comment

Concerning C.13 - Schering-Plough Animal Health Corporation intends to purchase seven new Dwyer Magnehelic differential pressure gauges to meet these specifications. However, we do question the rationale for selection of specifications which require the replacement of original equipment that was provided by the manufacturer of the dust collectors.

The type of gauge specified by this standard may not be suitable for all situations. As an example, Clinacox dust collector DC-102 does not have an integral blower. Materials are augered into and out of the silo and the only air movement is by displacement. The differential pressure always will be at or near zero (0), and a suitable pressure gauge may not be available.

Response

The manufacturer should be able to provide this information. There is no change in the condition.

5. Comment

Concerning C.21, Item (a) - Schering-Plough Animal Health Corporation objects to the requirement for duplicate reporting to both Indiana Department of Environmental Management and Vigo County Air Pollution Control. It should be sufficient to submit reports only to Vigo County Air Pollution Control.

Response

IDEM requires that the reporting be sent to them also, for their field inspector that covers this portion of the state, and for their permit department too. Therefore, Schering-Plough Animal Health Corporation must continue to send copies to both, IDEM and VCAPC. There is no change in the condition.

6. Comment

Concerning D.1.4 - This statement implies that our boilers have control devices, which they do not. The boilers are pre-engineered package units and are not equipped with control devices.

Response

A Preventive Maintenance Plan, in accordance with Section B - Preventive Maintenance Plan, of this permit, is required for this facility and any control devices the facility might have. As an example, maintenance of oil fired burners and combustion control is necessary to ensure proper operation to avoid excessive smoke and to avoid possible violation of opacity and particulate emission rules. Therefore, a Preventive Maintenance Plan is required even though the boilers do not have control devices.

7. Comment

Concerning D.2.5(a) - The three stacks associated with Clinacox are hypothetical stacks and cannot be monitored. Three of the dust collectors vent inside the building and the two silo dust collectors are outside and vent outside. The silo dust collectors only operate when transferring wheat middling into the silos or when transferring wheat middling from the silos into the process.

The wording should be changed to **“Visible emission notations for dust collectors DC-201, DC-301, and DC-401 shall be performed daily during normal daylight operation, when the process is in operation. Visible emission notations for dust collectors DC-101 and DC-102 shall be performed during normal daylight operation, when materials are being transferred.”**

Response

The Clinacox process has emissions exiting the building through numerous points which make identification of just a few discrete stack/vent points difficult. Schering-Plough Animal Health Corporation received guidance from Mr. Roger Letterman of the IDEM OAM, that the emissions from each building could be shown as being vented through a hypothetical stack located in the center of the building roof.

The language shall be changed to read as stated above.

8. Comment

Concerning D.2.6 - The total static pressure drop across the dust collectors will vary according to use and materials, and one fixed range may not be representative. See the attached table for operating conditions.

Response

The language shall be changed to list a range of 0-5 inches so that the range will be broad enough to represent all dust collectors.

9. Comment

Concerning D.2.8(b)(1) - Please clarify the meaning on *inlet and outlet differential static pressure*.

We interpret this record keeping requirement to mean the total static differential pressure drop across the dust collector, as stated in D.2.6.

Concerning D.2.8(b)(2) - Please clarify the meaning of *cleaning cycle: frequency and differential pressure*.

We interpret this record keeping requirement to mean that we will log nonautomatic bag cleaning that is performed manually either by time or at a predetermined pressure differential.

Response

This is the correct interpretation of “inlet and outlet differential static pressure” and “frequency and differential pressure”.

10. Comment

Concerning D.3.4 - The wet scrubbers for the salt solution tank are only operated during the transfer of salt into the tank. At all other times the salt in the tank is in an aqueous solution. D.3.4 should be changed to read **“The wet scrubbers shall be in operation at all times during the transfer of salt into the storage tank”**.

Response

The language shall be changed to read as stated above.

11. Comment

Concerning D.3.6 - This section is correct in stating that the scrubbers shall be operated at all times when loading and unloading salt, for the salt storage system.

Response

There is no change in the condition.

12. Comment

- (a) Concerning D.3.6(a) - Change the wording to read **“The Permittee shall monitor and record the pressure drop across the scrubbers during each transfer of salt into the salt storage tank.”** The transfer of salt may occur only 3-4 times each year and a weekly monitoring requirement would not serve any useful purpose.
- (b) This section states that we are supposed to monitor and record the pressure drop and flow rate of the scrubbers. Monitoring and recording the pressure drop serves a useful purpose. Monitoring a flow rate does not serve any known purpose. In addition, we do not know whether this means to monitor and record the air flow rate through the scrubbers or the scrubbing water flow rate. Schering-Plough Animal Health Corporation recommends removal of the requirement to monitor and record flow rate.

- (c) Is it acceptable to use a portable differential pressure device, rather than a fixed installation. Schering-Plough Animal Health Corporation can install ports on the salt tank exhaust stack and temporarily install a device during the transfer of salt into the tank.

Response

- (a) The language shall be changed to read as stated above.
 - (b) Originally, Schering-Plough Animal Health Corporation was instructed that they would have to monitor and record the scrubbing water flow rate. After further review, it was determined that the scrubber consisted of no more than a minute sprinkler system used to help control the PM emissions during salt unloading. Since the salt unloading occurs approximately 3-4 times per year and the system is so small, VCAPC considers the sprinkler system and parameters to be negligible.
 - (c) It is acceptable to use a portable differential pressure device. This will help fight against aging due to the weather from being outside year-round. There is no change in the condition.
13. Comment
Concerning D.3.7(a) - Change the wording to read **“The Permittee shall maintain records of visible emissions notations of the salt solution storage exhaust, taken during the transfer of salt into the salt storage tank.”** Because the salt is in an aqueous solution as soon as it enters the storage tank, there is no need for daily visible emissions monitoring.

Response

The language shall be changed to read as stated above.

14. Comment
Concerning D.3.7(b) - Remove the reference to monitoring and recording flow rate, as described in #12 for D.3.6(a).

Response

See number 12.

15. Comment
Concerning D.4.5 - The reference to the three (3) Clinacox stacks should be changed to reference the Zeranol process. The Zeranol process has one (1) hypothetical stack and the two (2) dust collectors vent outside the building. One of the two (2) dust collectors venting to the outside also contains methanol vapors. The wording should be changed to **“Daily visible emission notations of the two dust/vapor collector exhausts shall be performed during normal daylight operations.”** A vapor collector will be installed to separate the vapor removal from dust collection. Vigo County Air Pollution Control will be contacted at the appropriate time to determine whether or not a construction permit application will be required.

Response

The error shall be corrected to reference the Zeranol process and its hypothetical stack and two (2) dust collectors. The language shall be changed to read as follows: Daily visible emission notations of the two dust/vapor collector exhausts shall be performed during normal daylight operations. A trained employee shall record whether emissions are normal or abnormal.

16. Comment

Concerning D.4.6 - The total static pressure drop across the dust collectors will vary according to use and materials, and one fixed range may not be representative. See the attached table for operating conditions.

Response

See number 8.

17. Comment

Concerning D.4.8(b)(1) - Please clarify the meaning on *inlet and outlet differential static pressure*.

We interpret this record keeping requirement to mean the total static differential pressure drop across the dust collector, as stated in D.2.6.

Concerning D.4.8(b)(2) - Please clarify the meaning of *cleaning cycle: frequency and differential pressure*.

We interpret this record keeping requirement to mean that we will log nonautomatic bag cleaning that is performed manually either by time or at a predetermined pressure differential.

Response

This is the correct interpretation of “inlet and outlet differential static pressure” and “frequency and differential pressure”.

Upon further review, the OAM and VCAPC made the following changes:

- 1.(a) The allowable PM emissions under 6-3 were incorrectly determined in condition D.4 by calculating the allowable for each individual phase of the Zeranol process and then adding them up at the end. The individual phases pounds per hour should have been added up first, then one calculation done to determine the allowable emissions.
- (b) STK-Z1 is the exhaust for both, DC-202 and DC-203. The Compliance Monitoring Requirements incorrectly stated that visible emissions for the three Clinacox stacks will be recorded by a trained employee. This should read as follows: Daily visible emission notations of the two (2) dust/vapor collector exhausts shall be performed during normal daylight operations. A trained employee shall record whether emissions are normal or abnormal.
- (c) The batch weights on page 7 of the calculations are for the dry material only. The batch weights on page 9 are for the dry material **and** liquids.

- (d) The allowable PM emission rates per 326 IAC 6-3-2 were incorrectly calculated on page 9 of the calculations. The calculations were based on each individual process and then added together to determine a final emission rate. The correct determination would be to add all the process weight rates and then do the calculation to determine the final emission rate. The correct calculation is as follows:

Total process weight rate = 2,573 lbs/hr = 1.29 tons/hr

$E = 4.10(P^{0.67})$

Where E is the rate of emissions in lbs/hr and

$E = 4.10((1.29)^{0.67})$

P is the process weight rate in tons/hr.

E = 4.86 lbs/hr

- (e) The typographical errors have been corrected.

2. B.11 (Annual Compliance Certification) has been modified as follows:

B.11 Annual Compliance Certification [326 IAC 2-7-6(5)]

- (a) The Permittee shall annually *submit a compliance certification report which addresses the status of the source's compliance* with the terms and conditions contained in this permit, including emission limitations, standards, or work practices. The certification shall cover the time period from January 1 to December 31 of the previous year, and shall be submitted in letter form no later than July 1 of each year to:

3. C.3 (Opacity) remove the statement: "This condition is not federally enforceable."

4. C.4 (Open Burning) has been modified as follows:

C.4 Open Burning [326 IAC 4-1] [IC 13-17-9]

The Permittee shall not open burn any material except as provided in 326 IAC 4-1-3, 326 IAC 4-1-4 or 326 IAC 4-1-6. The previous sentence notwithstanding, the Permittee may open burn in accordance with an open burning approval issued by the Commissioner under 326 IAC 4-1-4.1.

326 IAC 4-1-3(a)(2)(A) and (B) are not federally enforceable.

5. C.5 (Incineration) remove the statement: "This condition is not federally enforceable."

6. C.6 (Fugitive Dust Emissions) has been modified as follows:

C.6 Fugitive Dust Emissions [326 IAC 6-4]

The Permittee shall not allow fugitive dust to escape beyond the property line or boundaries of the property, right-of-way, or easement on which the source is located, in a manner that would violate 326 IAC 6-4 (Fugitive Dust Emissions). *326 IAC 6-4-2(4) is not federally enforceable.*

7. C.21 (General Reporting Requirements) part (a) and (b) has been revised and the rest of the condition has been re-lettered as follows:

C.21 General Reporting Requirements [326 IAC 2-7-5(3)(C)]

- (a) *To affirm that the source has met all the requirements stated in this permit the source shall submit a Quarterly Compliance Report. Any deviation from the requirements and the date(s) of each deviation must be reported.*

- (b) The reports required in (a) of this conditions and reports required by Conditions in Section D of this permit shall be submitted to:

Indiana Department of Environmental Management
Compliance Data Section, Office of Air Management
100 North Senate Avenue, P. O. Box 6015
Indianapolis, Indiana 46206-6015

and

Vigo County Air Pollution Control
201 Cherry Street
Terre Haute, Indiana 47807

- (c) Unless otherwise specified in this permit, any notice, report, or other submission required by this permit shall be considered timely if the date postmarked on the envelope or certified mail receipt, or affixed by the shipper on the private shipping receipt, is on or before the date it is due. If the document is submitted by any other means, it shall be considered timely if received by IDEM, OAM, and VCAPC on or before the date it is due.
- (d) Unless otherwise specified in this permit, any quarterly report shall be submitted within thirty (30) days of the end of the reporting period.
- (e) All instances of deviations must be clearly identified in such reports. A reportable deviation is an exceedance of a permit limitation or a failure to comply with a requirement of the permit or a rule. It does not include:
- (1) An excursion from compliance monitoring parameters as identified in Section D of this permit unless tied to an applicable rule or limit; or
 - (2) An emergency as defined in 326 IAC 2-7-1(12); or
 - (3) Failure to implement elements of the Preventive Maintenance Plan unless lack of maintenance has caused or contributed to a deviation.
 - (4) Failure to make or record information required by the compliance monitoring provisions of Section D unless such failure exceeds 5% of the required data in any calendar quarter.

A Permittee's failure to take the appropriate response step when an excursion of a compliance monitoring parameter has occurred or failure to monitor or record the required compliance monitoring is a deviation.

- (f) Any corrective actions or response steps taken as a result of each deviation must be clearly identified in such reports.
- (g) The first report shall cover the period commencing on the date of issuance of this permit and ending on the last day of the reporting period.

8. D.1.5 (Testing Requirements) the example should read "Method 5 or 17", instead of "Method 5 or 7".
9. D.1.8 (Record Keeping Requirements) part (a) has been modified as follows:

Record Keeping and Reporting Requirements [326 IAC 2-7-5(3)] [326 IAC 2-7-19]

D.1.8 Record Keeping Requirements

- (a) To document compliance with Condition D.1.1, the Permittee shall maintain records in accordance with (1) through (6) below. Note that pursuant to 40 CFR 60 Subpart Dc, the fuel oil sulfur limit applies at all times including periods of startup, shutdown, and malfunction.
 - (1) Calendar dates covered in the compliance determination period;
 - (2) Actual usage since last compliance determination period and value calculated per limitation;
 - (3) A certification, signed by the owner or operator, that the records of the fuel supplier certifications represent all of the fuel combusted during the period; and
If the fuel supplier certification is used to demonstrate compliance the following, as a minimum, shall be maintained:
 - (4) Fuel supplier certifications.
 - (5) The name of the fuel supplier; and
 - (6) A statement from the fuel supplier that certifies the sulfur content of the fuel oil.

The Permittee shall retain records of all recording/monitoring data and support information for a period of five (5) years, or longer if specified elsewhere in this permit, from the date of the monitoring sample, measurement, or report. Support information includes all calibration and maintenance records and all original strip-chart recordings for continuous monitoring instrumentation, and copies of all reports required by this permit.

10. D.2.6 (Parametric Monitoring) additional language should be inserted as follows:
D.2.6 Parametric Monitoring
-

The Permittee shall record the total static pressure drop across the five (5) dust collectors used in conjunction with the Clinacox process, at least once weekly when the process is in operation *when venting to the atmosphere*. Unless operated under conditions for which the Preventive Maintenance Plan specifies otherwise, the pressure drop across the dust collectors shall be maintained within the range of **3.0 and 6.0** inches of water or a range established during the latest stack test. The Preventive Maintenance Plan for this unit shall contain troubleshooting contingency and corrective actions for when the pressure reading is outside of the above mentioned range for any one reading.

The instrument used for determining the pressure shall comply with Section C - Pressure Gauge Specifications, of this permit, shall be subject to approval by IDEM, OAM, and Vigo County Air Pollution Control and shall be calibrated at least once every six (6) months.

11. D.2.7 (Broken Bag or Failure Detection) has been modified as follows:

D.2.7 Broken Bag or Failure Detection

In the event that bag failure has been observed:

- (a) The affected compartments will be shut down immediately until the failed units have been repaired or replaced.
- (b) Within eight (8) hours of the determination of failure, response steps according to the timetable described in the *Compliance Response Plan* shall be initiated. For any failure with corresponding response steps and timetable not described in the *Compliance Response Plan*, response steps shall be devised within eight (8) hours of discovery of the failure and shall include a timetable for completion.

12. D.2.8 (Record Keeping Requirements) has been modified as follows:

Record Keeping and Reporting Requirements [326 IAC 2-7-5(3)] [326 IAC 2-7-19]

D.2.8 Record Keeping Requirements

- (a) To document compliance with Condition D.2.5, the Permittee shall maintain records of daily visible emission notations of the Clinacox stacks.
- (b) To document compliance with Condition D.2.6, the Permittee shall maintain the following:
 - (1) Daily records of the following operational parameters during normal operation when venting to the atmosphere:
 - (A) Inlet and outlet differential static pressure; and
 - (B) Cleaning cycle: frequency and differential pressure.
 - (2) Documentation of all corrective actions implemented, per event .
 - (3) Operation and preventive maintenance logs, including work purchases orders, shall be maintained.
 - (4) Quality Assurance/Quality Control (QA/QC) procedures.
 - (5) Operator standard operating procedures (SOP).
 - (6) Manufacturer's specifications or its equivalent.
 - (7) Equipment "troubleshooting" contingency plan.
 - (8) Documentation of the dates vents are redirected.

On January 16, 1998, discussions between IDEM and VCAPC resulted in the following comments on the proposed Schering-Plough Animal Health Corporation Part 70 permit. The summary of the comments is as follows:

1. Comment

Section D.1.4, the end refers to "and its control devices"; however, there is no mention of any control devices (Schering-Plough Animal Health Corporation also had this same comment).

Response

Language was changed in condition D.1.4 to state the following: "A Preventive Maintenance Plan, in accordance with Section B - Preventive Maintenance Plan, of this permit, is required for this facility and any control devices the facility might have."

2. Comment

Section D.4.3, the word "perclude" should be "preclude".

Response

The typographical error shall be corrected.

Upon further review (June 5, 1998), the OAM has decided to make the following revisions to the permit (bolded language has been added, the language with a line through it has been deleted). The Table Of Contents has been modified to reflect these changes.

1. Section A (Source Summary) has been revised to clarify that the description of the source in conditions A.1 through A.3 is informational only and does not constitute separately enforceable conditions. The descriptive information in other permit conditions is enforceable.

SECTION A

SOURCE SUMMARY

This permit is based on information requested by the Indiana Department of Environmental Management (IDEM), Office of Air Management (OAM) and Vigo County Air Pollution Control (VCAPC) and presented in the permit application. **The information describing the source contained in conditions A.1 through A.3 is descriptive information and does not constitute enforceable conditions. However, the Permittee should be aware that a physical change or a change in the method of operation that may render this descriptive information obsolete or inaccurate may trigger requirements for the Permittee to obtain additional permits or seek modification of this permit pursuant to 326 IAC 2, or change other applicable requirements presented in the permit application.**

2. Condition A.5 (Prior Permit Conditions Superseded) has been deleted. Language has been added to B.14 (Permit Shield) to address the effect of prior permit conditions. U.S. EPA stated that it would object to any permit that contained such supersession language.
3. Condition B.1(b) (Permit No Defense) has been revised to reference the permit shield condition that is found later in Section B.

- (b) This prohibition shall not apply to alleged violations of applicable requirements for which the Commissioner has granted a permit shield in accordance with 326 IAC 2-1-3.2 or 326 IAC 2-7-15, **as set out in this permit in the Section B condition entitled “Permit Shield.”**
4. Condition B.8 (c) (Duty to Supplement Information) has been revised to clarify how the Permittee may assert a claim that records are confidential information:
- (c) Upon request, the Permittee shall also furnish to IDEM, OAM and VCAPC copies of records required to be kept by this permit. **If the Permittee wishes to assert a claim of confidentiality over any of the furnished records,** ~~For information claimed to be confidential,~~ the Permittee **must** ~~shall~~ furnish such records to IDEM, OAM and VCAPC along with a claim of confidentiality under 326 IAC 17. If requested by IDEM, OAM, U.S. EPA, or VCAPC **to furnish copies of requested records directly to U. S. EPA, and if the Permittee is making a claim of confidentiality regarding the furnished records,** then the Permittee **must** ~~shall~~ furnish such confidential records directly to the U.S. EPA along with a claim of confidentiality under 40 CFR 2, Subpart B.
5. Section B.11 (c) (Annual Compliance Certification) has been revised to match changes to the federal Part 70 rules. The language in (c)(3) has been revised since it appears to be a clarification rather than a change in the requirement. The language in (c)(5) has been added to clarify the treatment of insignificant activities. OAM is revising the nonrule policy document Air-007 NPD to provide more guidance regarding the annual compliance certification requirements for sources with Title V permits:
- (c) The annual compliance certification report shall include the following:
 - (1) The identification of each term or condition of this permit that is the basis of the certification;
 - (2) The compliance status;
 - (3) Whether compliance was **based on** continuous or intermittent **data**;
 - (4) The methods used for determining compliance of the source, currently and over the reporting period consistent with 326 IAC 2-7-5(3); ~~and~~
 - (5) **Any insignificant activity that has been added without a permit revision; and**
 - ~~(5)~~ (6) Such other facts, as specified in Sections D of this permit, as IDEM, OAM and VCAPC, may require to determine the compliance status of the source.
- The ~~notification which shall be submitted~~ **submittal** by the Permittee does require the certification by the “responsible official” as defined by 326 IAC 2-7-1(34).

6. Condition B.12 (a) (Preventive Maintenance Plan) has been revised to more closely match the language in 326 IAC 1-6-3. A provision allowing a one time extension of the time within which the Permittee must prepare and maintain the PMP has also been added to (a).

B.12 Preventive Maintenance Plan [326 IAC 2-7-5(1),(3) and (13)] [326 IAC 2-7-6(1) and (6)] [326 IAC 1-6-3]

- (a) If required by specific condition(s) in Section D of this permit, the Permittee shall prepare and maintain Preventive Maintenance Plans (PMP) within **ninety (90) days** after issuance of this permit, including the following information on each **facility**:

- (1) Identification of the individual(s) responsible for inspecting, maintaining, and repairing ~~emission units and associated~~ emission control devices;
- (2) A description of the items or conditions that will be inspected and the inspection schedule for said items or conditions;
- (3) Identification and quantification of the replacement parts that will be maintained in inventory for quick replacement.

If due to circumstances beyond its control, the PMP cannot be prepared and maintained within the above time frame, the Permittee may extend the date an additional ninety (90) days provided the Permittee notifies:

Indiana Department of Environmental Management	Vigo County Air Pollution Control
Compliance Branch, Office of Air Management	and 201 Cherry Street
100 North Senate Avenue, P. O. Box 6015	Terre Haute, Indiana 47807
Indianapolis, Indiana 46206-6015	

- (b) The Permittee shall implement the Preventive Maintenance Plans as necessary to ensure that lack of proper maintenance does not cause or contribute to a violation of any limitation on emissions or potential to emit.
- (c) PMP's shall be submitted to IDEM, OAM and VCAPC upon request and shall be subject to review and approval by IDEM, OAM and VCAPC.
7. Condition B.14 (Permit Shield) condition has been revised to clarify how the permit shield affects applicable requirements from previous permits and how the permit shield affects determinations that a specific requirement is not applicable to the source.

B.14 Permit Shield [326 IAC 2-7-15]

- (a) **This condition provides a permit shield as addressed in 326 IAC 2-7-15.**

~~(a)~~ (b) **This permit shall be used as the primary document for determining compliance with applicable requirements established by previously issued permits.** Compliance with the conditions of this permit shall be deemed in compliance with any applicable requirements as of the date of permit issuance, provided ~~that either of the following:~~

- (1) The applicable requirements are included and specifically identified in this permit; **or**
 - (2) ~~IDEM, OAM, in acting on the Part 70 permit application or revision, determines in writing that other requirements specifically identified are not applicable to the source, and the Part 70 permit includes the determination or a concise summary thereof.~~ **The permit contains an explicit determination or concise summary of a determination that other specifically identified requirements are not applicable.**
- (b) (c) ~~No permit shield shall apply to any permit term or condition that is determined after issuance of this permit to have been based on erroneous information supplied in the permit application. If, after issuance of this permit, it is determined that the permit is in nonconformance with an applicable requirement that applied to the source on the date of permit issuance, including any term or condition from a previously issued construction or operation permit, IDEM, OAM and VCAPC shall immediately take steps to reopen and revise this permit and issue a compliance order to the Permittee to ensure expeditious compliance with the applicable requirement until the permit is reissued. The permit shield shall continue in effect so long as the Permittee is in compliance with the compliance order.~~
- (c) (d) ~~If, after issuance of this permit, it is determined that the permit is in nonconformance with an applicable requirement, IDEM, OAM, shall immediately take steps to reopen and revise this permit and issue a compliance order to the Permittee to ensure expeditious compliance with the applicable requirement until the permit is reissued. The permit shield shall continue in effect so long as the Permittee is in compliance with the compliance order. No permit shield shall apply to any permit term or condition that is determined after issuance of this permit to have been based on erroneous information supplied in the permit application.~~
- (d) (e) Nothing in 326 IAC 2-7-15 or in this permit shall alter or affect the following:
- (1) The provisions of Section 303 of the Clean Air Act (emergency orders), including the authority of the U.S. EPA under Section 303 of the Clean Air Act;
 - (2) The liability of the Permittee for any violation of applicable requirements prior to or at the time of this permit's issuance;
 - (3) The applicable requirements of the acid rain program, consistent with Section 408(a) of the Clean Air Act; and
 - (4) The ability of U.S. EPA to obtain information from the Permittee under Section 114 of the Clean Air Act.

- (f) This permit shield is not applicable to any change made under 326 IAC 2-7-20(b)(2) (Sections 502(b)(10) of the Clean Air Act changes) and 326 IAC 2-7-20(c)(2) (trading based on State Implementation Plan (SIP) provisions).
- (g) This permit shield is not applicable to modifications eligible for group processing until after IDEM, OAM and VCAPC, has issued the modifications. [326 IAC 2-7-12(c)(7)]
- (h) This permit shield is not applicable to minor Part 70 permit modifications until after IDEM, OAM and VCAPC, has issued the modification. [326 IAC 2-7-12(b)(8)]
8. Condition B.16 (Deviations from Permit Requirements and Conditions) has been revised to add the deviation terminology that had been contained in Section C, in the General Reporting Requirements condition:

B.16 Deviations from Permit Requirements and Conditions [326 IAC 2-7-5(3)(C)(ii)]

- (a) Deviations from any permit requirements (for emergencies see Section B - Emergency Provisions), the probable cause of such deviations, and any response steps or preventive measures taken shall be reported to:

Indiana Department of Environmental Management Compliance Branch, Office of Air Management 100 North Senate Avenue, P.O. Box 6015 Indianapolis, Indiana 46206-6015	and	Vigo County Air pollution Control 201 Cherry Street Terre Haute, Indiana 47807
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within ten (10) calendar days from the date of the discovery of the deviation.

- (b) **A deviation is an exceedance of a permit limitation or a failure to comply with a requirement of the permit or a rule. It does not include:**
- (1) **An excursion from compliance monitoring parameters as identified in Section D of this permit unless tied to an applicable rule or limit; or**
 - (2) **An emergency as defined in 326 IAC 2-7-1(12); or**
 - (3) **Failure to implement elements of the Preventive Maintenance Plan unless lack of maintenance has caused or contributed to a deviation.**
 - (4) **Failure to make or record information required by the compliance monitoring provisions of Section D unless such failure exceeds 5% of the required data in any calendar quarter.**

A Permittee's failure to take the appropriate response step when an excursion of a compliance monitoring parameter has occurred is a deviation.

- (b) (c) Written notification shall be submitted on the attached Emergency/Deviation Occurrence Reporting Form or its substantial equivalent. **The notification does not need to be certified by the “responsible official” as defined by 326 IAC 2-7-1(34).**
- (c) (d) Proper notice submittal under 326 IAC 2-7-16 satisfies the requirement of this subsection.
9. Condition B.18 (a) (Permit Renewal) has been changed as follows to clarify the treatment of certain trivial activities :
- (a) The application for renewal shall be submitted using the application form or forms prescribed by IDEM, OAM and VCAPC, and shall include the information specified in 326 IAC 2-7-4. Such information shall be included in the application for each emission unit at this source, except those emission units included on the trivial or insignificant activities list contained in 326 IAC 2-7-1(21) **and 326 IAC 2-7-1(40).**
10. Conditions B.19 (Administrative Permit Amendment), B.20 (Minor Permit Modification), and B.21 (Significant Permit Modification) have all been combined into one condition numbered B.19 (Permit Amendment or Modification). Conditions B.20 and B.21 have been deleted. The new Condition B.19 (Permit Amendment or Modification) will read as follows:
- B.19 Permit Amendment or Modification [326 IAC 2-7-11] [326 IAC 2-7-12]**
-
- (a) **The Permittee must comply with the requirements of 326 IAC 2-7-11 or 326 IAC 2-7-12 whenever the Permittee seeks to amend or modify this permit.**
- (b) **Any application requesting an amendment or modification of this permit shall be submitted to:**
- | | |
|---|--|
| Indiana Department of Environmental Management | Vigo County Air Pollution Control |
| Permits Branch, Office of Air Management | and 201 Cherry Street |
| 100 North Senate Avenue, P.O. Box 6015 | Terre Haute, Indiana 47807 |
| Indianapolis, Indiana 46206-6015 | |
- Any such application should be certified by the “responsible official” as defined by 326 IAC 2-7-1(34) only if a certification is required by the terms of the applicable rule.**
- (c) **The Permittee may implement the administrative amendment changes addressed in the request for an administrative amendment immediately upon submittal of the request. [326 IAC 2-7-11(c)(3)]**
11. Condition B.24 (Inspection and Entry) has been revised to remove the requirement for an IDEM identification card, which other agencies do not have.

B.24 Inspection and Entry [326 IAC 2-7-6(2)]

Upon presentation of ~~IDEM~~ **proper** identification cards, credentials, and other documents as may be required by law, the Permittee shall allow IDEM, OAM, U.S. EPA, VCAPC, or an authorized representative to perform the following:

- (a) Enter upon the Permittee's premises where a Part 70 source is located, or emissions related activity is conducted, or where records must be kept under the conditions of this permit;
 - (b) Have access to and copy, at reasonable times, any records that must be kept under the conditions of this permit;
 - (c) Inspect, at reasonable times, any facilities, equipment (including monitoring and air pollution control equipment), practices, or operations regulated or required under this permit;
 - (d) Sample or monitor, at reasonable times, substances or parameters for the purpose of assuring compliance with this permit or applicable requirements; and
 - (e) Utilize any photographic, recording, testing, monitoring, or other equipment for the purpose of assuring compliance with this permit or applicable requirements.
- [326 IAC 2-7-6(6)]

- (1) **The Permittee may assert a claim that, in the opinion of the Permittee, information removed or about to be removed from the source by IDEM, OAM and VCAPC, or an authorized representative, contains information that is confidential under IC 5-14-3-4(a). The claim shall be made in writing before or at the time the information is removed from the source. In the event that a claim of confidentiality is so asserted, neither IDEM, OAM, VCAPC, nor an authorized representative, may disclose the information unless and until IDEM, OAM, makes a determination under 326 IAC 17-1-7 through 326 IAC 17-1-9 that the information is not entitled to confidential treatment and that determination becomes final. [IC 5-14-3-4; IC 13-14-11-3; 326 IAC 17-1-7 through 326 IAC 17-1-9]**
- (2) **The Permittee, IDEM, OAM, and VCAPC acknowledge that the federal law applies to claims of confidentiality made by the Permittee with regard to information removed or about to be removed from the source by U.S. EPA. [40 CFR Part 2, Subpart B]**

12. Condition B.25 (b) (Transfer of Ownership or Operation) has been revised to clarify that this notification does not require a certification by a responsible official.

- (b) The written notification shall be sufficient to transfer the permit to the new owner by an administrative amendment pursuant to 326 IAC 2-7-11. **The notification which shall be submitted by the Permittee does not require the certification by the "responsible official" as defined by 326 IAC 2-7-1(34).**

13. Condition B.26 (Annual Fee Payment) has been revised to clarify the Permittee's responsibility for the timely payment of annual fees.

B.28 Annual Fee Payment [326 IAC 2-7-19] [326 IAC 2-7-5(7)]

- (a) The Permittee shall pay annual fees to IDEM, OAM, within thirty (30) calendar days of receipt of a billing. ~~or in a time period consistent with the fee schedule established in 326 IAC 2-7-19.~~ **If the Permittee does not receive a bill from IDEM, OAM or VCAPC the applicable fee is due April 1 of each year.**
- (b) Failure to pay may result in administrative enforcement action, or revocation of this permit.
- (c) ~~If the Permittee does not receive a bill from IDEM, OAM, thirty (30) calendar days before the due date,~~ The Permittee may call the following telephone numbers: 1-800-451-6027 or 317-233-0425 (ask for OAM, Technical Support and Modeling Section), to determine the appropriate permit fee. ~~The applicable fee is due April 1 of each year.~~

14. Condition C.1 is revised to change the overall source to an amount “less than” the applicable limit.

C.1 PSD Minor Source Status [326 IAC 2-2][40 CFR 52.21]

The total source potential ~~emissions~~ to emit of **volatile organic compound** is less than 250 tons per ~~365 consecutive day period~~ **year**. Therefore the requirements of 326 IAC 2-2 (Prevention of Significant Deterioration) and 40 CFR 52.21 will not apply.

15. Condition C.2 (Particulate Matter Emission Limitations For Processes with Process Weight Rates Less Than One Hundred (100) pounds per hour) is a new condition that reads as follows to address the PM emission limitation for facilities below 100 pounds per hour.

C.2 Particulate Matter Emission Limitations For Processes with Process Weight Rates Less Than One Hundred (100) pounds per hour [326 IAC 6-3-2(c)]

Pursuant to 326 IAC 6-3-2(c), the allowable particulate matter emissions rate from any process not already regulated by 326 IAC 6-1 or any New Source Performance Standard, and which has a maximum process weight rate less than 100 pounds per hour shall not exceed 0.551 pounds per hour.

16. Condition C.7 (Operation of Equipment) has been revised to clarify the requirement.

C.7 Operation of Equipment [326 IAC 2-7-6(6)]

All air pollution control equipment listed in this permit **and used to comply with an applicable requirement** shall be operated at all times that the emission unit vented to the control equipment is in operation. ~~as described in Section D of this permit.~~

17. Conditions C.9 (Asbestos Abatement Projects-Accreditation) and C.16 (Asbestos Abatement Projects) have been combined into one new condition C.8 (Asbestos Abatement Projects).

C.8 Asbestos Abatement Projects [326 IAC 14-10] [326 IAC 18] [40 CFR 61.140]

- (a) **Notification requirements apply to each owner or operator. If the combined amount of regulated asbestos containing material (RACM) to be stripped, removed or disturbed is at least 260 linear feet on pipes or 160 square feet on other facility components, or at least thirty-five (35) cubic feet on all facility components, then the notification requirements of 326 IAC 14-10-3 are mandatory. All demolition projects require notification whether or not asbestos is present.**
- (b) **The Permittee shall ensure that a written notification is sent on a form provided by the Commissioner at least ten (10) working days before asbestos stripping or removal work or before demolition begins, per 326 IAC 14-10-3, and shall update such notice as necessary, including, but not limited to the following:**
 - (1) **When the amount of affected asbestos containing material increases or decreases by at least twenty percent (20%); or**
 - (2) **If there is a change in the following:**
 - (A) **Asbestos removal or demolition start date;**
 - (B) **Removal or demolition contractor; or**
 - (C) **Waste disposal site.**
- (c) **The Permittee shall ensure that the notice is postmarked or delivered according to the guidelines set forth in 326 IAC 14-10-3(2).**
- (d) **The notice to be submitted shall include the information enumerated in 326 IAC 14-10-3(3).**

All required notifications shall be submitted to:

Indiana Department of Environmental Management	Vigo County Air Pollution Control
Asbestos Section, Office of Air Management	and 201 Cherry Street
100 North Senate Avenue, P.O. Box 6015	Terre Haute, Indiana 47807
Indianapolis, Indiana 46206-6015	

The notifications do not require a certification by the "responsible official" as defined by 326 IAC 2-7-1(34).

- (e) **Procedures for Asbestos Emission Control**
The Permittee shall comply with the emission control procedures in 326 IAC 14-10-4 and 40 CFR 61.145(c). Per 326 IAC 14-10-4 emission control requirements are mandatory for any removal or disturbance of RACM greater than three (3) linear feet on pipes or three (3) square feet on any other facility components or a total of at least 0.75 cubic feet on all facility components.

- (f) **Indiana Accredited Asbestos Inspector**
The Permittee shall comply with 326 IAC 14-10-1(a) that requires the owner or operator, prior to a renovation/demolition, to use an Indiana Accredited Asbestos Inspector to thoroughly inspect the affected portion of the facility for the presence of asbestos. The requirement that the inspector be accredited is federally enforceable.

18. Condition C.9 (Performance Testing) is revised to correct a rule citation, add a notification requirement, and clarify that any submittal under this condition does not require a certification by a responsible official:

C.9 Performance Testing ~~[326 IAC 3-2-1]~~ **[326 IAC 3-6]**

- (a) All testing shall be performed according to the provisions of 326 IAC ~~3-2-1~~ **3-6** (Source Sampling Procedures), except as provided elsewhere in this permit, utilizing methods approved by IDEM, OAM.

A test protocol, except as provided elsewhere in this permit, shall be submitted to:

Indiana Department of Environmental Management Compliance Data Section, Office of Air Management 100 North Senate Avenue, P. O. Box 6015 Indianapolis, Indiana 46206-6015	Vigo County Air Pollution Control 201 Cherry Street and Terre Haute, Indiana 47807
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no later than thirty-five (35) days ~~before~~ **prior to** the intended test date. **The Permittee shall submit a notice of the actual test date to the above address so that it is received at least two weeks prior to the test date.**

- (b) All test reports must be received by IDEM, OAM and VCAPC within forty-five (45) days after the completion of the testing. An extension may be granted by the Commissioner, if the source submits to IDEM, OAM and VCAPC, a reasonable written explanation within five (5) days prior to the end of the initial forty-five (45) day period.

The documentation submitted by the Permittee does not require certification by the "responsible official" as defined by 326 IAC 2-7-1(34).

19. Condition C.14 (Compliance Schedule) has been revised to more closely match the rule language.

C.14 Compliance Schedule ~~[326 IAC 2-7-6(3)]~~

The Permittee:

- (a) **Has certified that all facilities at this source are in compliance with all applicable requirements; and** ~~Will continue to comply with such requirements that become effective during the term of this permit; and~~
- (b) Has submitted a statement that the Permittee will continue to comply with such requirements; and

- (c) **Will comply with such applicable requirements that become effective during the term of this permit.** ~~Has certified that all facilities at this source are in compliance with all applicable requirements.~~

20. Condition C.10 (Compliance Monitoring) has been revised to allow a one time extension of the time to install and initiate any required monitoring.

C.10 Compliance Monitoring [326 IAC 2-7-5(3)] [326 IAC 2-7-6(1)]

Compliance with applicable requirements shall be documented as required by this permit. The Permittee shall be responsible for installing any necessary equipment and initiating any required monitoring related to that equipment, no more than ninety (90) days after receipt of this permit. If due to circumstances beyond its control, this schedule cannot be met, the Permittee **may extend compliance schedule an additional ninety (90) days provided the Permittee shall** notifies:

Indiana Department of Environmental Management
Compliance Branch, Office of Air Management and
100 North Senate Avenue, P. O. Box 6015
Indianapolis, Indiana 46206-6015

Vigo County Air Pollution Control
201 Cherry Street
Terre Haute, Indiana 47807

in writing, **prior to the end of the initial ninety (90) day compliance schedule** ~~no more than ninety (90) days after receipt of this permit~~, with full justification of the reasons for the inability to meet this date. ~~and a schedule which it expects to meet. If a denial of the request is not received before the monitoring is fully implemented, the schedule shall be deemed approved.~~

The notification which shall be submitted by the Permittee does require the certification by the "responsible official" as defined by 326 IAC 2-7-1(34).

21. Condition C.12 (Monitoring Methods) has been revised to clarify the requirement.

C.12 Monitoring Methods [326 IAC 3]

Any monitoring or testing performed to meet the **applicable** requirements of this permit shall be performed according to the provisions of 326 IAC 3, 40 CFR 60, Appendix A, or other approved methods as specified in this permit.

22. Condition C.15 (Risk Management Plan) has been revised to more closely match the rule language of 40 CFR 68 and clarify that any submittal under this condition requires a certification by a responsible official.

C.15 Risk Management Plan [326 IAC 2-7-5(12)] [40 CFR 68.215]

If a regulated substance, subject to 40 CFR 68, is present **in a process** in more than the threshold quantity, 40 CFR 68 is an applicable requirement and the Permittee shall:

- (a) Submit:

- (1) A compliance schedule for meeting the requirements of 40 CFR 68 by the date provided in 40 CFR 68.10(a); or

- (2) As a part of the compliance certification submitted under 326 IAC 2-7-6(5), a certification statement that the source is in compliance with all the requirements of 40 CFR 68, including the registration and submission of a Risk Management Plan (RMP); and
 - (3) A verification to IDEM, OAM and VCAPC, that a RMP or a revised plan was prepared and submitted as required by 40 CFR 68.
- (b) Provide annual certification to IDEM, OAM and VCAPC, that the Risk Management Plan is being properly implemented.

All documents submitted pursuant to this condition shall include the certification by the “responsible official” as defined by 326 IAC 2-7-1(34).

23. Condition C.16 (Compliance Monitoring Plan-Failure to Take Response Steps) the following rule cites were changed and added to the title, as follows:

C.16 Compliance Monitoring Plan - Failure to Take Response Steps [326 IAC 2-7-5(3)]
[326 IAC 2-7-6] [326 IAC 1-6]

24. Condition C.17 is revised to add the following rule cites to the title, and clarify that any submittal under this condition does not require a certification by a responsible official.

C.17 Actions Related to Noncompliance Demonstrated by a Stack Test **[326 IAC 2-7-5]**
[326 IAC 2-7-6]

- (a) When the results of a stack test performed in conformance with Section C - Performance Testing, of this permit exceed the level specified in any condition of this permit, the Permittee shall take appropriate corrective actions. The Permittee shall submit a description of these corrective actions to IDEM, OAM and VCAPC, within thirty (30) days of receipt of the test results. The Permittee shall take appropriate action to minimize emissions from the affected facility while the corrective actions are being implemented. IDEM, OAM and VCAPC shall notify the Permittee within thirty (30) days, if the corrective actions taken are deficient. The Permittee shall submit a description of additional corrective actions taken to IDEM, OAM within thirty (30) days of receipt of the notice of deficiency. IDEM, OAM and VCAPC reserves the authority to use enforcement activities to resolve noncompliant stack tests.
- (b) A retest to demonstrate compliance shall be performed within one hundred twenty (120) days of receipt of the original test results. Should the Permittee demonstrate to IDEM, OAM and VCAPC that retesting in one-hundred and twenty (120) days is not practicable, IDEM, OAM and VCAPC may extend the retesting deadline. Failure of the second test to demonstrate compliance with the appropriate permit conditions may be grounds for immediate revocation of the permit to operate the affected facility.

The documents submitted pursuant to this condition do not require the certification by the “responsible official” as defined by 326 IAC 2-7-1(34).

25. Condition C.18 (a) has been revised to clarify the certification requirement for the emission statement.

C.18 Emission Statement [326 IAC 2-7-5(3)(C)(iii)][326 IAC 2-7-5(7)][326 IAC 2-7-19(c)][326 IAC 2-6] [326 IAC 2-7-19 (e)]

- (a) The Permittee shall submit ~~an certified~~, annual emission statement **certified pursuant to the requirements of 326 IAC 2-6**, that must be received by **July 1** of each year and must comply with the minimum requirements specified in 326 IAC 2-6-4. The annual emission statement shall meet the following requirements and be used for the purpose of a Part 70 fee assessment:

26. Condition C.20 (General Record Keeping) is revised to add the following rule citation and to change the requirements for keeping records, making records available, and furnishing records, to more closely match the rule language as follows:

C.20 General Record Keeping Requirements [326 IAC 2-7-5(3)(B)][**326 IAC 2-7-6**]

- (a) Records of all required monitoring data and support information shall be retained for a period of at least five (5) years from the date of monitoring sample, measurement, report, or application. These records shall be kept at the source location **for a minimum of three (3) years** and available **upon the request** ~~within one (1) hour upon verbal request~~ of an IDEM, OAM, and **Vigo County Air Pollution Control** representative, ~~for a minimum of three (3) years. They~~ **The records** may be stored elsewhere for the remaining two (2) years **as long as they are available upon request** ~~providing they are made available within thirty (30) days after written request. If the Commissioner makes a written request for records to the Permittee, the Permittee shall furnish the records to the Commissioner within a reasonable time.~~

27. Condition C.21 (General Reporting Requirements) is revised to clarify what is included in the compliance monitoring reports and clarify that any submittal under this condition does not require a certification by a responsible official. The deviation terminology was moved to a Section B condition titled Deviations from Permit Requirements and Conditions.

C.21 General Reporting Requirements [326 IAC 2-7-5(3)(C)]

- (a) To affirm that the source has met all the **compliance monitoring** requirements stated in this permit the source shall submit a **Quarterly Compliance Monitoring Report**. Any deviation from the requirements and the date(s) of each deviation must be reported.
- (b) The report required in (a) of this condition and reports required by conditions in Section D of this permit shall be submitted to:

Indiana Department of Environmental Management Compliance Data Section, Office of Air Management 100 North Senate Avenue, P. O. Box 6015 Indianapolis, Indiana 46206-6015	and	Vigo County Air Pollution Control 201 Cherry Street Terre Haute, Indiana 47807
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- (c) Unless otherwise specified in this permit, any notice, report, or other submission required by this permit shall be considered timely if the date postmarked on the envelope or certified mail receipt, or affixed by the shipper on the private shipping receipt, is on or before the date it is due. If the document is submitted by any other means, it shall be considered timely if received by IDEM, OAM and VCAPC, on or before the date it is due.
- (d) Unless otherwise specified in this permit, any **quarterly** report shall be submitted within thirty (30) days of the end of the reporting period.
- (e) All instances of deviations **as described in Section B- Deviations from Permit Requirements Conditions** must be clearly identified in such reports. ~~A reportable deviation is an exceedance of a permit limitation or a failure to comply with a requirement of the permit or a rule. It does not include:~~
 - ~~(1) An excursion from compliance monitoring parameters as identified in Section D of this permit unless tied to an applicable rule or limit; or~~
 - ~~(2) An emergency as defined in 326 IAC 2-7-1(12); or~~
 - ~~(3) Failure to implement elements of the Preventive Maintenance Plan unless lack of maintenance has caused or contributed to a deviation.~~
 - ~~(4) Failure to make or record information required by the compliance monitoring provisions of Section D unless such failure exceeds 5% of the required data in any calendar quarter.~~

~~A Permittee's failure to take the appropriate response step when an excursion of a compliance monitoring parameter has occurred or failure to monitor or record the required compliance monitoring is a deviation.~~
- (f) Any corrective actions or response steps taken as a result of each deviation must be clearly identified in such reports.
- (g) The first report shall cover the period commencing on the date of issuance of this permit and ending on the last day of the reporting period.

The documents submitted pursuant to this condition do not require the certification by the "responsible official" as defined by 326 IAC 2-7-1(34).

28. The facility description box in Section D is revised to include the rule citation:

Facility Description [326 IAC 2-7-5(15)]

- 29. The Certification Form is revised to clarify which forms require a certification.
- 30. The Emergency/Deviation Occurrence Reporting Form is revised to eliminate the certification requirement.
- 31. The Quarterly Compliance Report is renamed the Quarterly Compliance Monitoring Report and is revised to make it easier to understand and use.
- 32. The signature line on the first page of the Part 70 Operating Permit has been revised from Felicia R. George to Janet G. McCabe.

**INDIANA DEPARTMENT OF ENVIRONMENTAL MANAGEMENT
OFFICE OF AIR MANAGEMENT
COMPLIANCE DATA SECTION**

**PART 70 OPERATING PERMIT
CERTIFICATION**

Source Name: Schering-Plough Animal Health Corporation
Source Address: 1331 South First Street, Terre Haute, Indiana, 47802
Mailing Address: 1331 South First Street, Terre Haute, Indiana, 47802
Part 70 Permit No.: T167-7544-00004

This certification shall be included when submitting monitoring, testing reports/results or other documents as required by this permit.

Please check what document is being certified:

☒ Annual Compliance Certification Letter

☐ ~~Emergency/Deviation Occurrence Reporting Form~~

☒ Test Result (specify) _____

☒ Report (specify) _____

☒ Notification (specify) _____

☒ Other (specify) _____

I certify that, based on information and belief formed after reasonable inquiry, the statements and information in the document are true, accurate, and complete.

Signature:

Printed Name:

Title/Position:

Date:

**INDIANA DEPARTMENT OF ENVIRONMENTAL MANAGEMENT
OFFICE OF AIR MANAGEMENT
COMPLIANCE DATA SECTION
P.O. Box 6015
100 North Senate Avenue
Indianapolis, Indiana 46206-6015
Phone: 317-233-5674
Fax: 317-233-5967**

**PART 70 OPERATING PERMIT
EMERGENCY/DEVIATION OCCURRENCE REPORT**

Source Name: Schering-Plough Animal Health Corporation
Source Address: 1331 South First Street, Terre Haute, Indiana, 47802
Mailing Address: 1331 South First Street, Terre Haute, Indiana, 47802
Part 70 Permit No.: T167-7544-00004

This form consists of 2 pages

Page 1 of 2

Check either No. 1 or No.2	
<input checked="" type="radio"/> 1.	This is an emergency as defined in 326 IAC 2-7-1(12) <input checked="" type="checkbox"/> The Permittee must notify the Office of Air Management (OAM), within four (4) business hours (1-800-451-6027 or 317-233-5674, ask for Compliance Section); and <input checked="" type="checkbox"/> The Permittee must submit notice in writing or by facsimile within two (2) days (Facsimile Number: 317-233-5967), and follow the other requirements of 326 IAC 2-7-16
<input checked="" type="radio"/> 2.	This is a deviation, reportable per 326 IAC 2-7-5(3)(c) <input checked="" type="checkbox"/> The Permittee must submit notice in writing within ten (10) calendar days

If any of the following are not applicable, mark N/A

Facility/Equipment/Operation:
Control Equipment:
Permit Condition or Operation Limitation in Permit:
Description of the Emergency/Deviation:
Describe the cause of the Emergency/Deviation:

If any of the following are not applicable, mark N/A

Page 2 of 2

Date/Time Emergency/Deviation started:
Date/Time Emergency/Deviation was corrected:
Was the facility being properly operated at the time of the emergency/deviation? Y N Describe:
Type of Pollutants Emitted: TSP, PM-10, SO ₂ , VOC, NO _x , CO, Pb, other:
Estimated amount of pollutant(s) emitted during emergency/deviation:
Describe the steps taken to mitigate the problem:
Describe the corrective actions/response steps taken:
Describe the measures taken to minimize emissions:
If applicable, describe the reasons why continued operation of the facilities are necessary to prevent imminent injury to persons, severe damage to equipment, substantial loss of capital investment, or loss of product or raw materials of substantial economic value:

Form Completed by: _____
Title / Position: _____
Date: _____
Phone: _____

~~Attach a signed certification to complete this report.~~

**INDIANA DEPARTMENT OF ENVIRONMENTAL MANAGEMENT
OFFICE OF AIR MANAGEMENT
COMPLIANCE DATA SECTION**

**PART 70 OPERATING PERMIT
QUARTERLY COMPLIANCE MONITORING REPORT**

Source Name: Schering-Plough Animal Health Corporation
Source Address: 1331 South First Street, Terre Haute, Indiana, 47802
Mailing Address: 1331 South First Street, Terre Haute, Indiana, 47802
Part 70 Permit No.: T167-7544-00004

Months: _____ **to** _____ **Year:** _____

This report is an affirmation that the source has met all the **compliance monitoring** requirements stated in this permit. This report shall be submitted quarterly. Any deviation from the **compliance monitoring** requirements and the date(s) of each deviation must be reported. Additional pages may be attached if necessary. This form can be supplemented by attaching the Emergency/Deviation Occurrence Report. If no deviations occurred, please specify ~~zero in the column marked "No Deviations"~~. **in the box marked "No deviations occurred this reporting period"**.

9 NO DEVIATIONS OCCURRED THIS REPORTING PERIOD.

**9 THE FOLLOWING DEVIATIONS OCCURRED THIS REPORTING PERIOD:
~~LIST EACH COMPLIANCE REQUIREMENT EXISTING FOR THIS SOURCE:~~**

<u>Compliance Monitoring Requirement</u> (e.g. Permit Condition D.1.3)	Number of Deviations	Date of each Deviations	No Deviations

Form Completed By: _____
Title/Position: _____
Date: _____
Phone: _____

~~Attach a signed certification to complete this report.~~

Company Name: Schering-Plough Animal Health Corporation
 Address, City IN Zip: 1331 South First Street
 T.V. T167-7544
 Plt ID: 167-00004
 Reviewer: Darren Woodward
 Date: August 18, 1997

Heat Input Capacity MMBtu/hr
 Potential Throughput S = Weight % Sulfur
 kgals/year 0.5

33.2 2077.4

Emission Factor in lb/kgal	Pollutant				
	PM	SO2	NOx	VOC	CO
	2.0	71 (142.0S)	20.0	0.20	5.0
Potential Emission in tons/yr	2.08	73.7	20.8	0.208	5.19

Methodology

1 gallon of No. 2 Fuel Oil has a heating value of 140,000 Btu

Potential Throughput (kgals/year) = Heat Input Capacity (MMBtu/hr) x 8,760 hrs/yr x 1kgal per 1000 gallon x 1 gal per 0.140 MM Btu

Emission Factors are from AP 42, Tables 1.3-2 and 1.3-4 (SCC 1-02-005-01/02/03)

Emission (tons/yr) = Throughput (kgals/ yr) x Emission Factor (lb/kgal)/2,000 lb/ton

Appendix A: Emissions Calculations
 Natural Gas Combustion Only
 10 < MM BTU/HR <100
 Small Industrial Boiler

Calculations - Page 2

Company Name: Schering-Plough Animal Health Corporation
 Address City IN Zip: 1331 South First Street
 CP: T167-7544
 Plt ID: 167-00004
 Reviewer: Darren Woodward
 Date: July 8, 1997

Heat Input Capacity MMBtu/hr	Potential Throughput MMCF/yr					
33.2	290.8					
Emission Factor in lb/MMCF	Pollutant					
	PM	PM10	SO2	NOx	VOC	CO
	13.7	13.7	0.6	140.0	2.8	35.0
Potential Emission in tons/yr	1.99	1.99	0.087	20.4	0.407	5.09

Methodology

MMBtu = 1,000,000 Btu

MMCF = 1,000,000 Cubic Feet of Gas

Emission Factors for NOx: Uncontrolled = 140, Low NOx Burner = 81, Flue gas recirculation = 30

Emission Factors for CO: Uncontrolled = 35, Low NOx Burner = 61, Flue gas recirculation = 37

Potential Throughput (MMCF) = Heat Input Capacity (MMBtu/hr) x 8,760 hrs/yr x 1 MMCF/1,000 MMBtu

Emission Factors are from AP 42, Chapter 1.4, Tables 1.4-1, 1.4-2, 1.4-3, SCC #1-02-006-02

Emission (tons/yr) = Throughput (MMCF/yr) x Emission Factor (lb/MMCF)/2,000 lb/ton

Company Name: Schering-Plough Animal Health Corporation
Address, City IN Zip: 1331 South First Street
T.V. T167-7544
Plt ID: 167-00004
Reviewer: Darren Woodward
Date: July 8, 1997

Heat Input Capacity MMBtu/hr
Potential Throughput S = Weight % Sulfur
kgals/year 0.5

33.2 1115.5 **(WITH THE LIMITATION)**

Emission Factor in lb/kgal	Pollutant				
	PM	SO2	NOx	VOC	CO
	2.0	71 (142.0S)	20.0	0.20	5.0
Potential Emission in tons/yr	1.12	39.6	11.2	0.112	2.79

Methodology

1 gallon of No. 2 Fuel Oil has a heating value of 140,000 Btu

Potential Throughput (kgals/year) = Heat Input Capacity (MMBtu/hr) x 8,760 hrs/yr x 1kgal per 1000 gallon x 1 gal per 0.140 MM Btu

Emission Factors are from AP 42, Tables 1.3-2 and 1.3-4 (SCC 1-02-005-01/02/03)

Emission (tons/yr) = Throughput (kgals/ yr) x Emission Factor (lb/kgal)/2,000 lb/ton

PM Calculations for salt storage system

Source ID	Maximum Unloading Rate (1) (lb/hr)	Annual Throughput (lb/year)		PM Emission Factor (4) (lb/ton)	Scrubber Control (5) Efficiency (%)	Particulate Matter Emissions (6)			
		Actual (2)	Potential (3)			Actual		Potential	
						lb/hr	ton/yr	lb/hr	ton/yr
Salt Storage	40000	280000	1500000	10	99	2	0.007	200	3.75

NOTES:

- (1) Maximum unloading rate of the salt delivery tank trucks.
- (2) Actual throughput based on four truck loads a year. Assuming a truck capacity of 1000 cubic feet and a salt density of 70 lbs/cu.ft yields 70000 lbs per truck load.
- (3) Maximum capacity of the system.
- (4) Dust generation factor provided by manufacturer (0.50% per ton of dry material).
- (5) Scrubber efficiency listed by manufacturer as 99.95% to 99.99%. PM emission calculations use 99% control efficiency.
- (6) Example Calculations:
Actual Emissions (tons/yr) = 280000 lb/yr x 1 ton/2000 lb x 10 lb/ton x (1-.99) x 1 ton/2000 lb = 0.007 tons/yr
Potential Emissions (tons/yr) = 1500000 lb/yr x 1 ton/2000 lb x 10 lb/ton x (1-.99) x 1 ton/2000 lb = 3.75 tons/yr

Particulate Matter Emissions from the Clinacox Process
Schering-Plough Animal Health Corporation
Terre Haute, Indiana

Calculations - Page 5

Clinacox Process Information	
Actual number of batches per day:	4
Potential number of batches per day:	6
Hours per batch:	4
Actual operating days (5 days/wk, 52 wks/yr):	260
Potential operating days (7 days/wk, 52 wks/yr):	365
Control Efficiency:	0.99

Step No.	Description	Throughput (lb/batch)	Emission Factor (lb PM/ton)	PM Emissions			
				Actual		Potential	
				lb/hr	tons/yr	lb/hr	tons/yr
1	Wheat Middlings Receiving Silo	4,650	1	0.006	0.012	0.581	2.546
2	Wheat Middlings Process Silo	4,650	1	0.006	0.012	0.581	2.546
3	Raw Materials Weighing	250	5	0.002	0.003	0.156	0.684
4	Raw Materials Mixing and Grinding	250	5	0.002	0.003	0.156	0.684
5	Product Blending	4,900	5	0.031	0.064	3.063	13.414
6	Product Bagging	4,900	5	0.031	0.064	3.063	13.414
Total PM Emissions				0.076	0.158	7.6	33.3

Notes

1	Throughputs obtained from Schering-Plough Animal Health Corporation's Clinacox (0.2%) Processing & Packaging SOP, CLIN 2150-5, Version No. 04.1
2	Raw material weighing, followed by mixing and grinding, is comprised of 230 lb calcium carbonate, 10 lb diclazuril and 10 lb silicon dioxide.
3	Product blending and bagging are comprised of 4650 lb of wheat middlings and 250 lb of dries (100 lb of soybean oil are also added)
4	Emission factors obtained from AP-42, Section 6.4, Grain Elevators and Processing Plants, 4th edition, September 1985
5	Emissions from the Clinacox process are restricted by a previous construction permit to 3.4 lbs/hr (14.9 tons/yr)

VOC and HAP Emissions from the Zeranol Process
Schering-Plough Animal Health Corporation
Terre Haute, Indiana

Calculations - Page 6

Zeranol Process Area (1)	Solvent Usage (4) (gals/batch)		Operating Time (5) (hrs/batch)	Annual Production (batches/year)		VOC Emissions (8)				HAP Emissions (9)			
	Methanol	TBA		Actual (6)	Potential (7)	Actual/Potential		Actual tons/yr	Potential tons/yr	Actual/Potential		Actual tons/yr	Potential tons/yr
						lb/batch	lb/hr			lb/batch	lb/hr		
THFES Mixture Production (2)	263.5	0	39	32	64	703.23	18.03	11.25	22.5	703.23	18.03	11.25	22.5
Isomer Separation	300	0	35	29	58	800.64	22.88	11.61	23.22	800.64	22.88	11.61	23.22
Isomer Conversion (3)	0	177.3	48.5	22	44	473.18	9.76	5.2	10.41	-	-	-	-
First Recrystallization	254	0	43	12	24	677.88	15.76	4.07	8.13	677.88	15.76	4.07	8.13
Second Recrystallization	212	0	31	4	8	565.79	18.25	1.13	2.26	565.79	18.25	1.13	2.26
Implant Crystallization	53	0	23	66	132	141.45	6.15	4.67	9.34	141.45	6.15	4.67	9.34
CHAR Extraction	200	0	25	5	10	533.76	21.35	1.33	2.67	533.76	21.35	1.33	2.67
Solvent Cleanup (10)	2	0	2	66	132	5.34	2.67	0.18	0.35	5.34	2.67	0.18	0.35
Total VOC and HAP Emissions						3,895.9	112.2	39.3	78.5	3,422.7	102.4	34.1	68.1

Notes:

- (1) VOC emission calculations are based on 40% of the solvent used in the process being discharged to the atmosphere and 60% being discharged. This emission estimate is derived from AP-42, Section 6.13. Pharmaceuticals Production (methanol data), fifth edition, January 1995.
- (2) Includes 300 gals MeOH per batch, 25 gals cleanup rinse, 50 gals makeup, 15 gals to wash in extra catalyst if reaction doesn't go to completion and an average of 126.5 gals MeOH recovered. (Source: 1996 Schering-Plough Animal Health Corporation PQ data and batch records).
- (3) Includes 330 gals TBA per batch, 25 gals cleanup rinse and an average of 177.7 gals TBA recovered. (Source: PQ data).
- (4) Solvent usages obtained from 1996 Schering-Plough Animal Health Corporation PQ data and batch records.
- (5) Operating hours obtained from Standard Production Times spreadsheet prepared by Schering-Plough Animal Health Corporation.
- (6) Actual production is for calendar year 1995 provided by Schering-Plough Animal Health Corporation.
- (7) Potential production assumes Zeranol process currently operates at 50% capacity.
- (8) Based on a specific gravity of 0.80 for MeOH and TBA. (Per MSDS, specified gravity for MeOH is 0.79 and for TBA is 0.78).
- (9) MeOH is a Hazardous Air Pollutant (HAP) but TBA is not.
- (10) Based on 10 gals MeOH used for cleanup of the Nauta Dryer for every 5 implants.

Zeranol Process
 Particulate Matter Emissions from Process Exhaust Unit (DC-203)
 Schering-Plough Animal Health Corporation
 Terre Haute, Indiana

Calculations - Page 7

Zeranol Process Area (1)	Amount of Dries Added (lbs/batch) (2)				Operating Time (3) (hrs/batch)	Annual Production (batches/year)		PM Emissions (6)					
	Char	Supercell	Intrmdt.	Total		Actual (4)	Potential (5)	Actual (7)			Potential (8)		
								lb/batch	lb/hr	tons/yr	lb/batch	lb/hr	tons/yr
THFES Mixture Production (9)	40	50	211	301	39	32	64	0.03	0.0008	0.0005	3.02	0.077	0.096
Isomer Separation	0	0	308	308	35	29	58	0.031	0.0009	0.0005	3.08	0.088	0.089
Isomer Conversion	0	0	229	229	48.5	22	44	0.023	0.0005	0.0003	2.29	0.047	0.05
First Recrystallization	40	2	264	306	43	12	24	0.031	0.0007	0.0002	3.06	0.071	0.037
Second Recrystallization	0	0	220	220	31	4	8	0.022	0.0007	4E-05	2.2	0.071	0.009
Implant Crystallization	0.551	0.551	55	56	23	66	132	0.006	0.0002	0.0002	0.562	0.024	0.037
CHAR Extraction	0	0	332	332	25	5	10	0.033	0.001	8E-05	3.32	0.133	0.017
Total PM Emissions								0.175	0.005	0.002	17.5	0.512	0.336

Notes:

- (1) Represents the production areas of the Zeranol process controlled by Process Exhaust Unit DC-203. Emissions from the Nauta Dryer (Implant) step are negligible.
- (2) Information obtained from 1996 Schering-Plough Animal Health Corporation PQ data and batch records. Intrmdt. = Intermediate products (FES, DHFES, ISHM/LM, RXHM/LM, TWHM/LM AND ICLM).
- (3) Operating hours obtained from Standard Production Times spreadsheet prepared by Schering-Plough Animal Health Corporation.
- (4) Actual production is for calendar year 1995 provided by Schering-Plough Animal Health Corporation.
- (5) Potential production assumes Zeranol process currently operates at 50% capacity.
- (6) PM emissions based on an uncontrolled emission factor of 20 lb/ton of dries. Source: Paint and Varnish, Section 6.4, AP-42, fifth edition, January 1995.
- (7) Based on 99% control efficiency of Process Exhaust Unit, DC-203.
- (8) Based on potential production and uncontrolled PM emissions.
- (9) Raney Nickel Catalyst (28 kg/batch) is not considered because it is maintained under water for explosion prevention.

Zeranol Process
 Particulate Matter Emissions from Tray Dump Room (DC-202)
 Schering-Plough Animal Health Corporation
 Terre Haute, Indiana

Calculations - Page 8

Zeranol Process Area (1)	Dries Quantity (2) (lbs/batch)	Operating Time (3) (hrs/batch)	Annual Production (batches/year)		PM Emissions (6)					
			Actual (4)	Potential (5)	Actual (7)			Potential (8)		
					lb/batch	lb/hr	tons/yr	lb/batch	lb/hr	tons/yr
Isomer Separation	308	35	29	58	0.031	0.0009	0.0005	3.08	0.088	0.089
Isomer Conversion	229	48.5	22	44	0.023	0.0005	0.0003	2.29	0.047	0.05
First Recrystallization	264	43	12	24	0.026	0.0006	0.0002	2.64	0.062	0.032
Second Recrystallization	220	31	4	8	0.022	0.0007	4E-05	2.2	0.071	0.009
Implant Crystallization	55	23	66	132	0.006	0.0002	0.0002	0.55	0.024	0.037
CHAR Extraction	332	25	5	10	0.033	0.001	8E-05	3.32	0.133	0.017
Total PM Emissions					0.141	0.004	0.001	14.1	0.425	0.234

Notes:

- (1) Represents all manufacturing areas of the Zeranol process where the products are dried in the Hot Air Dryers (D-301 through D-306) and handled in the Tray Dump Room controlled by Dust Collector DC-202. Emissions from the Nauta Dryer (Implant) step are negligible.
- (2) Assumes the amount of material produced (handled/dried) from a particular process is equal to the amount of material charged in Information obtained from 1996 Schering-Plough Animal Health Corporation PQ Data and batch records.
- (3) Operating hours obtained from Standard Production Times spreadsheet prepared by Schering-Plough Animal Health Corporation.
- (4) Actual production is for calendar year 1995 provided by Schering-Plough Animal Health Corporation.
- (5) Potential production assumes Zeranol process currently operates at 50% capacity.
- (6) PM emissions based on an uncontrolled emission factor of 20 lb/ton of dries. Source: Paint and Varnish, Section 6.4, AP-42, fifth edition, January 1995.
- (7) Based on 99% control efficiency of Dust Collector DC-202 in Tray Dump Room.
- (8) Based on potential production and uncontrolled PM emissions.

Zeranol Process
 Allowable Particulate Matter Emission Rate per 326 IAC 6-3-2.
 Schering-Plough Animal Health Corporation
 Terre Haute, Indiana

Calculations - Page 9

Zeranol Process Area	Total (lbs/batch)	Operating Time (hrs/batch)	Process Weight Rate		Allowable Emission Rate (lbs/hr)
			(lbs/hr)	(tons/hr)	
THFES Mixture Production	14349	39	368	0.184	1.32
Isomer Separation	13819	35	395	0.197	1.38
Isomer Conversion	14043	48.5	290	0.145	1.12
First Recrystallization	13677	43	318	0.159	1.2
Second Recrystallization	13394	31	432	0.216	1.47
Implant Crystallization	4663	23	203	0.101	0.88
CHAR Extraction	14176	25	567	0.284	1.76
TOTALS			2573	1.29	4.85

NOTES:

- (1) Batch information obtained from 1996 Schering-Plough Animal Health Corporation PQ data and batch records.
- (2) Allowable emissions per 326 IAC 6-3-2 based on following equation: $E = 4.10(P)^{0.67}$.
 Where P is the process weight rate in tons/hr.

Combustion Sources
Actual Criteria Pollutant Emissions
Schering-Plough Animal Health Corporation
Terre Haute, Indiana

Calculations - Page 10

Source	Rating (MMBtu/hr)	Annual Fuel Usage			Annual Emissions (lbs/yr) (3)				
		Type (1)	Units	Actual (2)	Actual				
					PM	SO2	NOx	CO	VOC
Boiler 101	16.6	Fuel Oil	gallons	1000	2	71	20	5	0.3
		Nat. Gas	cu. feet	3.3E+07	452.1	19.8	4620	1155	191.4
Boiler 102	16.6	Fuel Oil	gallons	1000	2	71	20	5	0.3
		Nat. Gas	cu. feet	3.3E+07	452.1	19.8	4620	1155	191.4
Total Emissions (lbs/yr)					904.2	142	9240	2310	382.8
Total Emissions (tons/yr)					0.4521	0.071	4.62	1.155	0.1914

* **Bold = worst case between natural gas and fuel oil**

Notes:

- (1) The boilers use natural gas as primary fuel with fuel oil as backup.
- (2) Actual fuel usage data obtained from 1995 Plant Emissions Inventory report. 1995 natural gas usage (66,000,000 cubic feet) was equally divided between the two boilers.
- (3) Combustion emission factors obtained from AP-42, fifth edition, January 1995.

Fuel Type	Units	PM	SO2	NOx	CO	VOC
No. 2 Fuel Oil	lb/10 ³ gal	2	71	20	5	0.252
Natural Gas	lb/10 ⁶ ft ³	13.7	0.6	140	35	5.8

* Although lead is a criteria pollutant, it is not included in this table since negligible lead emissions are generated.

* SO2 fuel oil emission factor is equal to 142 x 0.5% sulfur (permit limit).